



Facility Response Plan (FRP)

FRP Prepared For:

Coastal Energy Corporation
234 Burnham Road
Willow Springs, MO 65793

FRP Prepared By:

Environmental Works, Inc.
1455 E. Chestnut Expy
Springfield, MO 65802
417-890-9500

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Table of Contents

Table of Contents	ii
FRP Cover Sheet	iv
Introduction.....	v
1.0 Emergency Response Action Plan	1
2.0 Facility Information	2
3.0 Emergency Response Information	3
3.1 Emergency Spill Notification Form	4
3.2 Emergency Contact Information	5
3.3 OSRO Spill List.....	6
3.3.1 Emergency Equipment List and Location	7
3.4 Response Equipment Testing and Deployment Drills	8
3.5 Personnel.....	9
3.6 Evacuation Plan	10
3.7 Qualified Individual Duties	11
4.0 HAZARD EVALUATION	13
4.1. Hazard Identification	13
4.1.1 Transfer Operations	16
4.1.2 Loading and unloading operations.....	16
4.1.3 Day-to-day operations.....	16
4.1.4 Normal Daily Throughpu	16
4.1.5 Secondary containment volumes.....	16
4.2 Vulnerability Analysis	16
4.3 Analysis for a Potential for a Spill	17
4.4 Spill history	17
5.0 Discharge Scenarios.....	17
5.1 Small and Medium Discharges	17
5.1.1 Factors Affecting Small Discharge Response Efforts	17
5.1.2 Factors Affecting Medium Discharge Response Efforts	18
5.2 Worst Case Discharge	18
6.0 DISCHARGE DETECTION SYSTEM.....	20
7.0 Plan implementation	21
7.1 Response Resources for Small Spills 40 CFR part 112, App. E (3.0)	21

7.2 Response Resources for Medium Spills..... 24

7.3 Response Resources for Worst Case Spills (part 112, Appendix E, section 7.6.1– 7.7.5) 25

7.4 Disposal Plans 27

7.5 Containment and drainage planning 27

8.0 SELF INSPECTION, TRAINING, AND MEETING LOGS 28

8.1 Facility Self-inspection..... 28

8.1.1 Tank and Secondary Containment 28

8.1.2 Response Equipment Checklist 28

8.2 Facility drills and exercises 32

8.3 Response training 32



APPENDICES

Appendix A	National preparedness for response exercise program (PREP) guidelines
Appendix B	Planning distance
Appendix C	Record Keeping Forms
Appendix D	Planning volume worksheet
Appendix E	Boom Placement Diagram
Appendix F	Emergency Response Plan
Appendix G	QI Training

LIST OF FORMS

		Page
Form 1	Spill notification	4
Form 2	Storage log sheet	Appendix C
Form 3	Spill checklist	Appendix C
Form 4	Deleted	
Form 5	QI log	31
Form 6	Personnel training log	33
Form 7	Team Training Table top log	34
Table 1	Emergency contact list	5
Table 2	OSRO spill equipment list	6
Table 3	COASTAL spill equipment list	7
Table 4	Coastal response personnel	8
Table 5	Hazard identification of tanks	10
		14

FRP Cover Sheet

**COASTAL ENERGY CORPORATION
RESPONSE PLAN COVER SHEET**

40 CFR part 112.20 (a)(ii) and 112 .21

FACILITY NAME	COASTAL ENERGY CORPORATION
LOCATION	232 BURNHAM ROAD
CITY	WILLOW SPRINGS
COUNTY	HOWELL
STATE	MISSOURI
LATITUDE	36° 58' 31" N
LONGITUDE	91° 57' 7" W
PHONE	417 469 2777
PLANT MANAGER	Scott Altermatt
SIC CODE	1422
LARGEST TANK IN SERVICE	420,000 gallons
MAXIMUM OIL STORAGE CAPACITY	2,812,000 gallons
WORST CASE OIL DISCHARGE	420,000 single largest tank; 2,502,000 gallons
DISTANCE TO NAVIGABLE WATER	200 feet
NUMBER OF STORAGE TANKS	38

Introduction

As regulated under 40 CFR 112, owners or operators of facilities that pose a threat of substantial harm to the environment by discharging oil into water bodies or a joining shorelines are required to prepare and submit facility specific response plan (FRP) to the United States Environmental Protection Agency. A threat of substantial harm includes facilities that have more than 1,000,000 gallons oil storage and are located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments. One of the objectives of this FRP is to provide the necessary planning tools to successfully address a worst case scenario discharge event.

The FRP helps an owner or operator develop a response organization and ensure the availability of response resources (i.e., response equipment, trained personnel) needed to respond to an oil discharge. The FRP also demonstrates that the response resources are available in a timely manner, thereby reducing a discharge's impact and severity. The FRP also helps a facility owner or operator improve discharge prevention measures through the early identification of risks at the facility. In addition, FRPs aid local and regional response authorities to better understand the potential hazards and response capabilities in their area.

The plan will be periodically reviewed and updated to ensure the facility description, response capabilities, and release scenario represent current facility practices. The plan will also be updated to address changes in the regulations or upon notification of regulatory authorities that the plan should be updated to be consistent with regulations. At a minimum, yearly reviews will be conducted. The Plan will be available during normal business hours at the company headquarters.

1.0 Emergency Response Action Plan

Several sections of this response plan are bound separately and kept in the front of this binder for easy access by response personnel during an actual emergency or oil spill. This binder is the Emergency Response Action Plan, which is intended to contain as much information as necessary to respond to an emergency or spill and is arranged so response actions are not delayed.

The Emergency Response Action Plan consists of the following sections:

- Qualified Individual Information
- Emergency Notification Phone List
- Spill Response Notification Form
- Response Equipment List and Location
- Response Equipment Testing and Deployment
- Facility Response Team Information
- Evacuation Plan
- Facility Diagrams

2.0 Facility InformationDate of Last Update MAY 2014

Facility name:		Coastal Energy Corporation	
Location: (Street Address)		234 Burnham Road	
City:	<u>Willow Springs</u>	State:	<u>Missouri</u>
		Zip:	<u>65793</u>
County:	<u>Howell</u>	Phone Number	<u>(417) 469-2777</u>
Latitude:	<u>36° 58' 31" N</u>	Longitude:	<u>91° 57' 7" W</u>
Wellhead Protection Area:		The facility is not located within a wellhead protection area	
Owner:	<u>David Montgomery – President</u>		
Owner Address:	<u>1 Coastal Drive, Willow Springs, Missouri 65793</u>		
Plant Manager:	<u>Scott Altermatt</u>		
Qualified Individual:			
	Name:	<u>Gary Picard, Safety Officer</u>	
	Position:	<u>Safety Officer</u>	
	Phone Number:	<u>(417)469-2777O, (417)469 3312 H (417) 855-0194 C</u>	
Training	<u>Annual Facility Response Training</u>		
Other Qualified Individuals on site include Company President and Plant Manager, they can be reached at (417) 469 2777			
Date Facility Started Operation:	<u>2003</u>		
Current Operation:	<u>The facility stores ethanol, asphaltic oil, diesel and various polymers</u>		
SIC Code:	<u>1422</u>		
Maximum Oil Storage Capacity	<u>2,812,000</u>		
Largest in-service oil Storage Tank	<u>420,000</u>		

3.0 Emergency Response Information

Information provided in this section describes what is necessary in the event of an actual emergency involving the discharge of oil or a combination of hazardous substances and oil discharge. The emergency response information section of the plan includes the following components:

- An emergency notification phone list in section 3.2 to identify and prioritize the names and phone numbers of organizations and personnel that must be notified immediately in the event of emergency. COASTAL maintains a list of 24 hour contact numbers at the operations headquarters. These numbers should be verified each time the plan is revised.
- Emergency response personnel will have appropriate response training. Response time will vary based on time of day and personnel activities.
- A spill response notification form (Form 1) will be provided to the National Response Center (NRC) and other emergency response personnel as appropriate.
- Section 3.3 lists oil spill response equipment available for an Oil Spill Response Organization (OSRO) and other available on site. When appropriate the listing should describe the size of release that the emergency response equipment can handle and any limitations.
- Description in section 3.4 of response equipment testing and deployment.
- A list of personnel in section 3.5.
- List of factors in section 3.6 that should be considered when preparing the evacuation plan.

3.1 Emergency Spill Notification Form

FORM 1 - SPILL NOTIFICATION INFORMATION FORM			
Reporter's Last Name:	First:	Middle Initial:	Reporter's Company Position:
Phone Number(s) :			
Facility Name: COASTAL ENERGY CORPORATION	Owners Name: DAVID MONTGOMERY- President	Organization Type : SIC CODE 1422	
232 Burnham Road, Willow Springs			State: MISSOURI Zip:65793
Were Materials Released: (Y/N)		Confidential : (Y/N)	
Meeting Federal Obligations to Report : (Y/N)		Date Called:	
Calling for Responsible Party: (Y/N)		Time Called:	
Incident Description			
Source and/or Cause of Incident:			
Date:		Time of Incident:	
Incident Address/Location :			
Container Types: ethanol, asphaltic oil, fuel oil, polymer Tank Capacity : Units: gallons			
Facility Capacity : 2,812,000 Units: gallons			
Facility Latitude: 36 degrees 58' 31" N			
Facility Longitude : 91 degrees 57' 7" W			

3.2 Emergency Contact Information

The contact list and telephone numbers for those individuals / agencies who must be contacted in case of a discharge are provided in **Table 1.0**

Table 1.0 Emergency Contacts

CONTACT	RESPONSIBLE ROLE	PHONE NUMBER
<u>Primary contact</u> Gary Picard Safety Officer	Notification to agencies; Emergency Response initiation	(417) 469-2777 Office (417) 469 3312 Home (417) 855-0194 Cell
<u>Secondary contact</u> Scott Altermatt David Montgomery	Notification to agencies; Emergency Response initiation	(417) 252 1060 cell (417) 252 1050 cell
GOVERNMENTAL CONTACTS		
National Response Center	Incident reporting (if required)	1 (800) 424-8802
Federal On-Scene Coordinator (EPA Region VII)	Incident reporting; Spill response assistance	(913) 281-0991 or (913) 551-7000
State Emergency Response Commission (SERC)	Incident reporting	1 (800) 780-1014
Missouri Department of Natural Resources	Incident reporting; Spill response assistance	(573) 634-2436
Fire Department / Police Department	Traffic and crowd control; Evacuation	911
EMERGENCY RESPONSE CONTRACTORS:		
Environmental Works, Inc.	Spill response and clean up resources	(417) 890-9500 (office) (877) 827-9500 (24-hour)
OTHER CONTACTS		
National Weather Service (St. Louis, MO)	Weather reports	(636) 441-8467
KUKU 100.3 1450 NEWS RADIO KWPM KSPQ 93.9	Public information	(888) 581-4487 (417) 256 1025 (417) 256 1025 (417) 256 3131
Missouri One-Call	Utility location	1(800) 344-7483
Texas County Memorial Hospital 716 Main St. Cabool, MO Mercy St Francis Hospital 100 W Hwy 60 Mountain View , MO Ozarks Medical Center 1100 Kentucky Ave, West Plains, MO	Medical assistance	(417) 962-5303 (417) 934-7000 (417) 256-9111

3.3 OSRO Spill List

Table 2.0 Oil Spill Response Organization OSRO Spill List

Number	Item	Number	Item	Number	Item
1	Bar & Chain Oil (1 gallon)	1	Post Driver	1	Cutting Torch
2	5gal Gas Cans	1	Sledge Hammer	3	Diaphragm pumps
2	5gal Diesel Cans	4	Barricades	4	PVC Gloves
3	Caution Tape	6	Cones	4	Tychem QC
4	Duct Tape	3	RP Shovel	4	Tyvek
1	Bailing Wire	3	SP Shovel	6	Boot Gauntlets
36	Zip Ties – 3 dozen	3	Leaf Rakes	4	4ml Nitrile
2	Bentonite	2	Spade Shovel	4	11mil Nitrile
2	Lime	6	Plastic (rolls)	10	Poly Drums
20	18" Wooden Stakes	4	Flashlights	100	55-gallon drums
4	2' Silt Fence'	4	Fire Extinguisher	4	Super Sacks
2	Push Brooms	2	Picks	3	Roll Off Liners
1	Eye Wash Station	2	Leaf Blowers	1	Drum Dolly
1	Bolt Cutter	2	Snow Fence (rolls)	2	Drum Liners
1	Hand Saw	1	Compressor	100	Floor Dry (bags)
1	Speed Wrench	1	Generator	20	absorbent pads (100 ct box)
4	Extension Cord 100ft	1	Acid Pump	80	10ft x 5in absorbent boom.
2	1000watt Halogen	1	Air Hose	200	12" skirted hard boom (ft)
1	500watt Halogen	1	Acid Pump Hose		
10	Field Trucks	1	Trackhoe (225)	1	Confined Space Entry
2	Dump Truck	1	Trackhoe (330)	1	Tank Nibbler
	Guzzler Air Mover				
2	Vacuum truck	2	Backhoe	1	Compressor (210 CFM)
1	Liquid Vacuum Truck	2	Skid Steer	3	CSE equipment
1	Liquid tanker truck	3	Mini Vacuum trailers		

3.3.1 Emergency Equipment List and Location

Coastal will rely on OSRO and other emergency contractors to respond to a spill. Coastal does maintain response equipment inventory sufficient to only address smaller and medium spills. Table 3 identifies the type and location of the emergency response equipment, including personal protective equipment available at the facility. These materials should be routinely inventoried and inspected. They should also be replenished or replaced as needed.

Table 3.0 Emergency Equipment

COASTAL EMERGENCY EQUIPMENT	Material is in emergency trailer Equipment is staged by warehouse
9-Safety Cones	5-Bags Granular Absorbent
1 –Axe	10-Bags Sphag Sorb
2-Heavy Rock Rake	50-18"X18" White Oil Only Sorbent Pillows
4-Shovels	14-18"X8" White Oil Only Sorbent Pillows
1-Broom	200-17"X19" White Oil Only Sorbent Pads
5-Hard Hats	1-38"X144' White Oil Only Sorbent Roll
5-Face Shields	32-2"X4' White Oil Only Socks
5-Safety Glasses	7-2"X8' White Oil Only Socks
1-Tyvek Suits	3-4"X8' White Oil Only Booms
4-Multi-purpose Coveralls	8-8"X10' White Oil Only Booms
3-TYPE 270 Oil Absorbent Booms	Caterpillar TC-30 Forklift Hard Surface Only 2500lb capacity
Lull 944 E 42' boom fork attachment	3000 Ford Tractor with 5' Box Blade
Case 621 B articulating rubber tire loader 3 yd. bucket	225 Caterpillar skid steer with 1yrd bucket attachment and forklift attachment.
1988 Ford Dump Truck	Caterpillar TC-30 Forklift Hard Surface Only 2500lb capacity
1991 Toyota Pickup	JLG Man Lift 80HX 500lb capacity
1 Service Truck with 3" product pump	
1 3" Gas Powered Trash pump	

3.4 Response Equipment Testing and Deployment Drills

The types of exercises/drills required under the National Preparedness for Response Exercise Program (PREP) and their frequency are listed in the table below. Portions of the PREP guidelines are included in Appendix A.

Exercises / Drills Schedule

DRILL	FREQUENCY
Internal Call Out/ Qualified Individual (QI) Notification	Quarterly
Spill Management Team Tabletop	Annually
Equipment Deployment - facility with Oil Spill Response Organization (ORSO) response equipment cited in plan	ANNUALLY (TO BE CONDUCTED BY OSRO)

The scope and objectives of the QI Notification, Spill management team tabletop, and equipment deployment (facility with OSRO cited in the plan) exercises/drills are described below:

1. QI Notification Exercises

Scope: Exercise communications between the facility personnel and the QI

Objectives: Contact must be made with a QI or designee, as designated in the response plan.

2. Spill Management Team Tabletop Exercise

Scope: Exercise the spill management team's organization, communication, and decision-making in making a spill response.

Objectives: Exercise the spill management team in a review of:

- Knowledge of the response plan
- Proper notifications
- Communication system
- Ability to access an ORSO
- Coordination of internal organization personnel with responsibility for spill response

- An annual review of the transition from a local team to a regional or national team
- Ability to effectively coordinate spill response activity with the National Response System. If the personnel from NRS are not participating in the exercise then the spill management team should demonstrate knowledge of the response coordination with NRS

At least one management team tabletop exercise in a triennial cycle would involve simulation of a worst-case discharge scenario.

3. Equipment Deployment Exercises - Facilities with OSRO response equipment cited in their response plan. (note: The OSRO is responsible for conducting these exercises.)

Scope:

- Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment for deployment and is described in "guiding principles."
- All of the OSRO's personnel involved in equipment deployment operations must be included in a comprehensive training program.
- All of the OSRO's equipment must be included in a comprehensive maintenance program. It should be taken for equipment deployment conducted during training.
- The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with manufacturer's recommendations and best commercial practices. The facility owner or operator must ensure that inspection and maintenance by the OSRO is documented. The OSRO must provide inspection and maintenance information to the owner or operator.

Objectives:

- Demonstrated ability of the personnel to deploy and operate response equipment.
- Ensure the response equipment is in proper working order.

3.5 Personnel

List of Employees and Duties:

Gary Picard - Safety officer and Qualified Individual (QI). Plans for and conducts training, addresses spill response activities at the plant and coordinates response for actual spill. Gary will be the final decision maker on evacuation of the facility in a worst case scenario and on spill clean-up of any size.

In the event Gary is unavailable then Scott Altermatt - will be secondary QI. Scott is the facility manager and head of maintenance. In the event Gary and Scott are not available then David Montgomery, President, will be the QI.

Garry Barton- Plant manager, responsible for plant operations, scheduling other employees, unloading rail cars, trucks, pulling samples for testing, truck loading, plant maintenance, etc.

Staff

Gary Roberts- Plant maintenance, hooking up rail cars for heating, unloading cars and trucks, loading trucks, making sure shipping papers are in order, etc.

Marty Makowski- Responsible for proper blending of PMA asphalt, operation of skid system, operation of blower system, lab testing, boiler operation and maintenance, assists with unloading of rail cars and trucks, and loading of trucks for outbound shipments. Also, assists with general plant maintenance and operation.

Table 4 summarizes Coastal Response Personnel information.

Table 4.0 Coastal Response Personnel

NAME	PHONE	RESPONSE TIME	RESPONSIBILITY DURING RESPONSE ACTION	QUALIFICATIONS/ TRAINING
Gary Picard	(417) 855 0194	5 minutes	QI/Safety Officer	QI- authority and training to mobilize appropriate resources
Scott Attermatt	417 252 1060	5 minutes	Alternate QI	Authority and training to mobilize appropriate resources
David Montgomery	417 252 1050	5 minutes	Alternate QI	Authority and training to mobilize appropriate resources

3.6 Evacuation Plan

Based on the analysis of this facility, a emergency evacuation plan has been developed to the help identify response activities and detail evacuation processes for most emergencies. This plan is available on site with the QI. Personnel safety should be considered at all times during the spill response. Evacuation routes and evacuation regrouping areas are shown on figure 2.

In case of an evacuation all employees will be notified by alarm and through radios (by safety officer or his designee) and will receive instructions as to the selection of a predetermined rendezvous location. Employees will exit in an orderly fashion. The safety officer will make certain all employees are accounted for and await further instruction from first responders.

After an all clear, employees will receive further instruction.

Notable safety issues will be crossing the active rail line to established rally point 1 and rally point 2. The proximity of Ethanol tanks in case of a fire or explosion and the location of the oil

storage tanks make the designated rally points attractive to allow for ingress/egress of response vehicles and provide a safe distance to ensure employee safety.

During evacuation consideration should be given to the following factors:

- Location of stored materials 30,000 gallon Ethanol tanks and 420,000 Asphaltic Oil tanks are very close to the facility operations building. Locations are shown in figure 2.
- Hazards imposed by spilled material - Ethanol is highly combustible. All tanks of various oils and materials should be considered in the event of an evacuation.
- Flow direction of the spill the flow direction of the material released will dictate evacuation paths. Generally speaking the topography of the site ensures the flow will be down gradient to the levee and contained along the levee system to the secured outfall.
- Prevailing wind direction and speed - wind direction and speed should also be taken in consideration during the evacuation.
- Arrival route of emergency response equipment and personnel. There is only one ingress and egress to the facility along Burnham road. This is the reason for the evacuation routes chosen in figure 2, to stay out of the way of incoming emergency equipment.
- Evacuation route - The decision to evacuate will be made by the Safety Officer and QI. Predetermined route paths will be taken given local environmental factors and the type of emergency.

3.7 Qualified Individual Duties

The qualified individual (QI):

Has the authority to commit monies for spill response and the responsibility and authority to take such action as necessary to protect human health and the environment. To ensure that fires, explosions, and releases do not occur, recur or spread to other areas, and to coordinate remedial actions with governmental agencies. Those major activities may include stopping operations, collecting and containing release materials, and removing or isolating containers. If the facility operations are stopped, the QI must visually monitor area for leaks, pressure buildup, gas generation, ruptures in valves, pipes, or other equipment, wherever appropriate.

To perform these functions the QI will:

- Activate internal alarms and hazard communication systems to notify all facility personnel
- Notify all response personnel as needed
- Identify the character, exact source, amount, and extent of the release, as well as other items needed for notification

- Notify and provide necessary information to the appropriate authorities with designated response rolls
- Processes interaction of the spilled substance with water and/or other substances stored at the facility and notify response personnel at the scene of that assessment
- Process the possible hazards of the release (direct and indirect) to human health and the environment
- Assess and implement prompt removal actions to contain and remove the substance released
- Coordinate rescue and response actions as previously arranged with all response personnel
- Obtained authority to immediately access company funding to initiate cleanup activities and direct cleanup activities until properly relieved of his responsibilities

4.0 HAZARD EVALUATION

Hazard identification and evaluation assists facility owners and operators in planning for potential releases. This can potentially reduce the severity of discharges that may occur. The evaluation will also enable the operator to identify and correct potential sources of releases, identify special health and safety hazards to workers and emergency response personnel, and review the facility's spill history.

4.1. Hazard Identification

No surface impoundments for liquid wastes or waste containing free liquids are in place at this facility. The following List of instructions was used to complete the hazard identification form for tanks

- Tank number Identify each tank at the facility that is used to store oil or hazardous materials. List each tank with a separate and distinct identifier.
- Substance stored Report the material that is stored in each tank identified if the tank is used to store more than one material, list all stored materials.
- Quantity stored For each material stored in the tank, report the average volume of material (gallons) stored on any given day.
- Tank type for each tank report the type of tank, for example field constructed steel (FCS) or double walled, and the year the tank was originally installed.
- Maximum capacity Recording the operational maximum capacity gallons for each tank. If the maximum capacity varies with the season, record the upper and lower limits.
- Failure/cause Record the cause and date of any tank failure that resulted in a loss of tank contents

Table 5.0 Hazard Identification of Tasks

Tank Number	Product	Capacity	Type / Year	Failure Cause	Secondary Containment (gallons)
A-1	ETHANOL	30,000	DOUBLE WALL 2005	NONE	
A-2	ETHANOL	30,000	DOUBLE WALL 2005	NONE	
A-3	ETHANOL	30,000	FCS 2006	NONE	65,000
A-4	ETHANOL	30,000	FCS 2006	NONE	65,000
A-5	ETHANOL	30,000	FCS 2006	NONE	65,000
A-6	ETHANOL	30,000	FCS 2006	NONE	65,000
A-7	ETHANOL	30,000	FCS 2006	NONE	65,000
A-8	ETHANOL	30,000	FCS 2006	NONE	65,000
A-9	ETHANOL	30,000	FCS 2006	NONE	65,000
A-10	ETHANOL	30,000	FCS 2006	NONE	65,000
F-1	FUSEL	20,000	PURCHASED 2012	NONE	23,500
F-2	FUSEL	20,000	PURCHASED 2012	NONE	23,500
1	ASPHALTIC OIL	30,000	USED 2004	NONE	DIKE
2	ASPHALTIC OIL	30,000	USED 2004	NONE	DIKE
3	ASPHALTIC OIL	30,000	USED 2004	NONE	DIKE
4	ASPHALTIC OIL	30,000	USED 2004	NONE	DIKE
5	ASPHALTIC OIL	30,000	USED 2004	NONE	DIKE
6	ASPHALTIC OIL	30,000	USED 2004	NONE	DIKE
7	ASPHALTIC OIL	210,000	FCS 2009	NONE	DIKE
8	ASPHALTIC OIL	410,000	FCS 2008	NONE	DIKE
9	ASPHALTIC OIL	410,000	FCS 2008	NONE	DIKE
10	ASPHALTIC OIL	420,000	FCS 2009	NONE	DIKE

Tank Number	Product	Capacity	Type / Year	Failure Cause	Secondary Containment (gallons)
11	ASPHALTIC OIL	420,000	FCS 2009	NONE	DIKE
12	ASPHALTIC OIL	30,000	FCS 2010	NONE	DIKE
13	ASPHALTIC OIL	30,000	FCS 2010	NONE	DIKE
14	ASPHALTIC OIL	30,000	FCS 2010	NONE	DIKE
15	ASPHALTIC OIL	30,000	FCS 2010	NONE	DIKE
16	POLYMER	30,000	FCS 2011	NONE	DIKE
17	POLYMER	30,000	FCS 2011	NONE	DIKE
18	ASPHALTIC OIL	30,000	FCS 2011	NONE	DIKE
19	ASPHALTIC OIL	30,000	FCS 2011	NONE	DIKE
20	ASPHALTIC OIL	30,000	FCS 2011	NONE	DIKE
21	ASPHALTIC OIL	30,000	FCS 2011	NONE	DIKE
22	ASPHALTIC OIL	30,000	FCS 2013	NONE	DIKE
23	ASPHALTIC OIL	30,000	FCS 2013	NONE	DIKE
24	ASPHALTIC OIL	30,000	FCS 2013	NONE	DIKE
B1	DIESEL	12,000	FCS 2013	NONE	DIKE
WC-1	WATER	20,000	FCS 2014	NONE	DIKE
LP-1	LP	8,650	PURCHASED USED	NONE	DIKE
LP-2	LP	8,650	PURCHASED USED	NONE	DIKE
Transformer	Transformer oil	175	Installed 2013	NONE	DIKE

4.1.1 Transfer Operations

Asphaltic oil blends, polymers, ethanol and diesel are delivered by railcar and tanker truck to this facility. The various products are measured and recorded daily. Delivery amounts vary based on tank inventory.

4.1.2 Loading and unloading operations - Tank cars and tank trucks maybe loaded and unloaded at this facility as described in the Spill Prevention Control and Countermeasures Plan. The average transfer of a tank car is 18,000 to 25,000 gallons; the average transfer volume of a tank truck is 7,000 gallons. Secondary containment in the loading/unloading area is secured by the perimeter berm that surrounds the down gradient portion of the facility. There is no special secondary containment in the loading/unloading area.

4.1.3 Day-to-day operations - In 2013 over 14 million gallons of product was transferred into and out of this facility. Seasonally the asphaltic oil operations are more active during the warmer part of the year.

4.1.4 Normal Daily Throughput - The approximate normal daily throughput for this facility is 80,000 gallons per day.

4.1.5 Secondary containment volumes - The Ethanol and Fusel above ground storage tanks are equipped with secondary containment to store 42,128 gallons. There are two levels of protection at the Coastal site. The levee/dike system the surrounds the plant and there are two secondary containment areas for some of the tanks. The dike/levee system is capable of stabilizing a volume of 3,514,000 gallons. The secondary containment for the #2 diesel and back-up generator is capable of holding 77,552 gallons of product. This containment structure is 4 inch thick reinforced concrete. Given the total storage capacity of the plant is 2,812,000 gallons, this storage capacity is more than adequate given the unique space constraint in operation at this site.

4.2 Vulnerability Analysis

The following section describes the potentially sensitive areas within the 20-mile (actual hydrograph data as determined in appendix C-III is 17.53 miles) planning distance. The primary concerns for substantial harm that could be caused by a major spill that reached the Eleven Point River. There is no public water intake in the 20 mile planning distance; however the Eleven Point River is only 200 feet away from the lowermost area of containment. The area is sparsely populated and the facility is located outside Willow Springs business district. In the unlikely event that an oil spill at the facility would discharge to the Eleven Point River, COASTAL will use every means necessary to remediate and recover contamination causes by a failure at its facility. Highway 63 would not be impacted by an oil spill due to the elevation of the highway in relationship to the river at this area.

At this section of the water body this is listed as a 303D losing stream. No flow has been observed during several on-site visits. The stream is typically a dry channel with intermittent pools of standing water. Access to remediate a cleanup in the stream channel is excellent given the percentage of time this stream has little to no water flow at this location. The river with sustainable flow is approximately 15 miles downstream.

The only endangered species include the Mooneye, Ozark Shiner, Checkered Madtom and the Southern Cavefish. The best way to limit the impact to these species is to stop any discharge to the river as soon as possible.

4.3 Analysis for a Potential for a Spill

The analysis of the potential for a spill considers tank age, spill history, horizontal range of a potential spill (in the dike containment area), and vulnerability to natural disaster. Those factors are discussed below:

Tank age - most tanks at this facility are less than 10 years old; therefore, tank age is not a major concern.

Spill history - there are no recorded spill event at the facility.

Horizontal Range of a Potential Spill - the dike are contains all of the surface drainage of this site, therefore there is no concern.

Vulnerability to Natural Disaster - the seismic area of the New Madrid Fault is only rated at .14 - .18% in this area of the state

4.4 Spill history

As described in 40 CFR Part 110, reportable spills are those that (a) violate applicable water quality standards, or (b) cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

There have been no reportable spills at this facility.

5.0 Discharge Scenarios

This section provides a description of the facility's worst case discharge, as well as small and medium discharges, as appropriate. A tiered planning approach has been used because the response actions to discharge (i.e., equipment, products and personnel) are dependent on the magnitude of the discharge. Planning for lesser discharges is necessary because the nature of the response may be qualitatively different depending on the quantity of the discharge.

5.1 Small and Medium Discharges

To address tiered planning requirements, Coastal has considered facility operations that could contribute to a small or medium discharge. A small discharge amount is less than 2,100 gallons. A medium discharge amount is between 2,100 and 36,000 gallons. Small and medium discharges may result from:

- Loading and unloading surface transportation. Loading and unloading of tank cars and tank trucks occurs at this facility.
- Facility maintenance. Minor drips and spills (less than 5 gallons) can occur from maintenance activities.
- Facility pumps and piping. A break in one of the facility pipes or small leak in one of the pumps can cause a small spill.

5.1.1 Factors Affecting Small Discharge Response Efforts

The Safety Officer and Qualified Individual (Gary Picard) will lead on site personnel. Gary and his staff will address small spills resulting from hose leaks, dripping seals, or other factors causing a release of 2,100 or less dependent on the material released.

For heavy oil products, diesel and polymer spills, the on-site staff will remediate with absorbent pads and loose material, removing the material to an approved storage vessel and disposing the material as required by regulation.

In the case of a highly flammable release (Ethanol) the following precautions apply:

- Ethanol is colorless and highly flammable
- Eliminate all ignition source, flames and sparks
- Area must be well ventilated
- Equipment used in handling the product must be grounded
- Do not touch or walk through spilled material
- Stop leaks only if you can do it without risk
- A vapor suppressing alcohol resistant foam may be used
- Alcohol breaks down in the film of regular foam
- Absorb or cover with dry earth, sand or other noncombustible material
- Evacuate the facility as necessary to predetermined rendezvous points

5.1.2 Factors Affecting Medium Discharge Response Efforts

On site personnel work to contain medium sized spills using equipment resources at the facility to trench and make temporary earthen dikes. Absorbent material will be applied as necessary to contain the material. A Qualified Emergency Contractor, (Environmental Works, Inc.) will be activated to respond and remediate the spill. Material will be placed in approved roll-off vessels and will be treated as a Hazardous Waste until final disposal options are selected. Precipitation can affect response effort, but due to the viscosity of the material on site (exception Ethanol) vertical migration is unlikely. Natural drainage to the facility is toward the dike and levee system.

Deploy Qualified Contractor (Environmental Works, Inc.) and on site individuals to remediate the contamination. Material will be contained using booms or pads and disposed of in approved containers under the direction of the safety officer.

In the case of a highly flammable release (Ethanol) the following precautions apply:

- Ethanol is colorless and highly flammable
- Eliminate all ignition source, flames and sparks
- Area must be well ventilated
- Equipment used in handling the product must be grounded
- Do not touch or walk through spilled material
- Stop leaks only if you can do it without risk
- A vapor suppressing alcohol resistant foam may be used
- Alcohol breaks down in the film of regular foam
- Absorb or cover with dry earth, sand or other noncombustible material
- Evacuate the facility as necessary to predetermined rendezvous points

5.2 Worst Case Discharge

When planning for the worst case discharge response, all the previous factors listed in the small and medium discharge sections of this Plan should be addressed. The worst case discharge for this facility is 2,502,000 gallons. This includes all the tanks that do not have specific secondary containment plus the largest tank with secondary containment. The worst case would not likely occur with any single problem associated with loading or unloading of surface transportation, facility maintenance, or facility pumps / piping. The worst case could occur in the event of a tornado, earthquake or in the event of a catastrophic fire.

Initial response will include on site personnel, (as described throughout this plan), staff will notify the Safety Officer who will in turn make an assessment of the incident and then make the notification calls to local, state or federal officials as appropriate. If rendered safe, the on-site personnel will work to contain the spill. Calls will be made to a Qualified Contractor (Environmental Works, Inc.) to deploy to the site and execute the remediation. Control valves will be turned to the closed position or secured otherwise. Seals and plugs will be used as necessary. All ignition sources will be secured to prevent a fire. If necessary, the facility will be evacuated and staff will be directed to predetermined rally points dependent on existing environmental factors, such as weather and wind conditions.

6.0 DISCHARGE DETECTION SYSTEM

Tanks are visually inspected daily. There is an alarm system for overtopping of the asphaltic oil tanks. Aboveground storage containers, associated piping, and secondary containment systems are to be inspected in accordance with the inspection procedures as outlined the facility SPCC Plan. The Plant Manager is responsible for ensuring these inspections are performed as required and all items requiring corrective actions are addressed. Completed inspection forms are to be signed by the inspector and maintained with the official copy of this Plan or the SPCC Plan for at least three years. A copy of the AST inspection form can be found in the Facility SPCC Plan. A copy of the Response Equipment Inspection Form is attached as Form 2.

SPP/FRP monthly inspections are located in Appendix C

7.0 Plan implementation

7.1 Response Resources for Small Spills 40 CFR part 112, App. E (3.0)

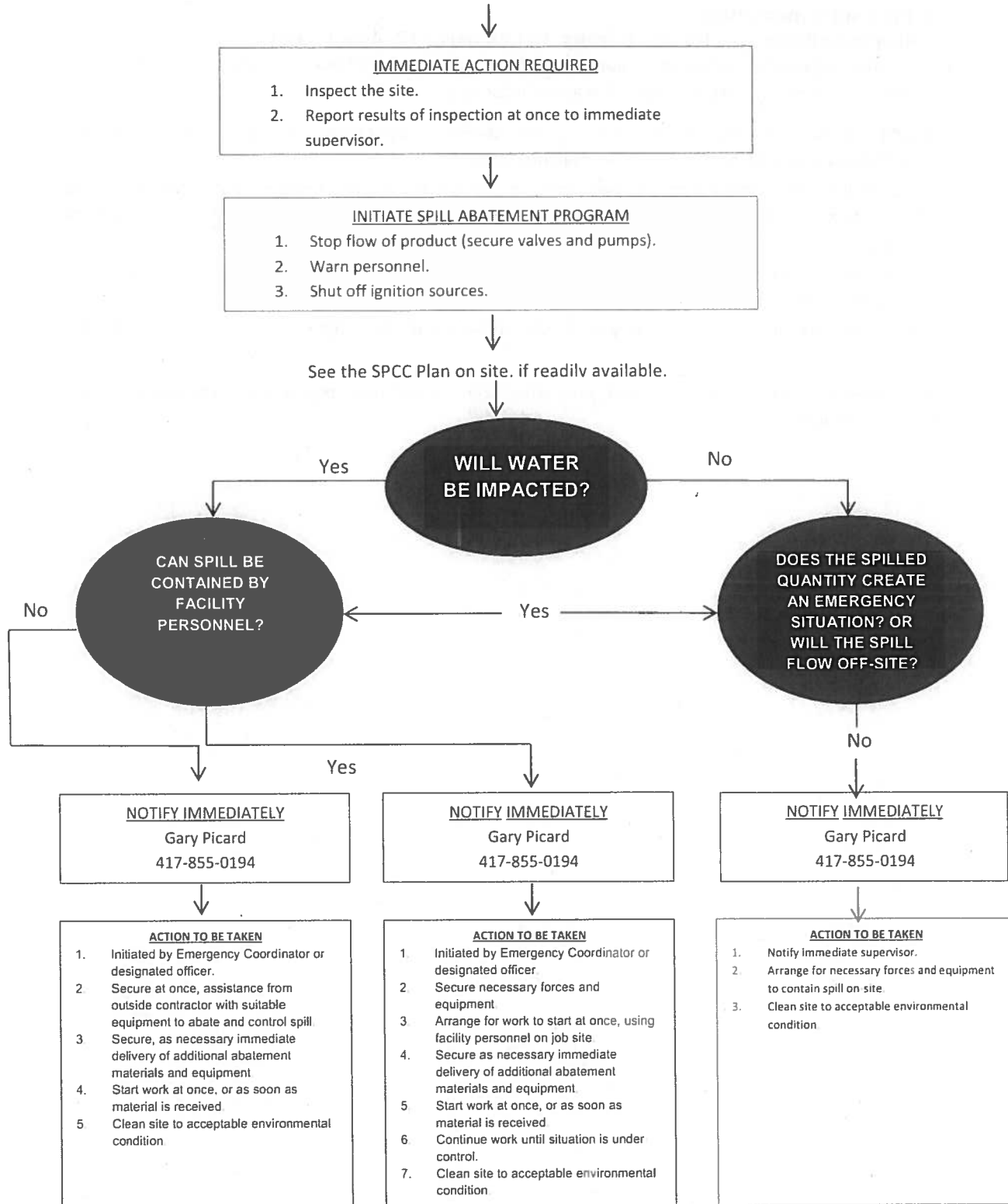
A small discharge is defined as an amount less than or equal to 2,100 gallons. According to the final rule, the equipment required to deal with a small discharge at this site is:

- A facility must have sufficient response resources available, by contract, or other approved means as described in part 112, to respond to a small discharge.
- 1,000 feet of containment boom or two times the length of the largest vessel that regularly conducts oil transfers to or from the facility; and a means of deployment within one hour of the discovery of the spill.
- Oil recovery devices with a daily recovery rate equal to the amount of the oil discharged in a small spill, within two hours of the detection of an oil discharge
- Oil storage capacity of recovered oily material, equivalent to twice the effective daily recovery rate.

Environmental factors of weather (heat, rain, wind, snow or ice) must be considered in response and clean-up activities.

COASTAL ENERGY CORPORATION CONTINGENCY PLAN**(EMERGENCY ACTION) FLOW CHART**

OIL SPILL DETECTED AND REPORTED BY ON-DUTY OFFICER



Oil recovery devices are determined as follows:

the effective daily rate recovery rate is 2,100 gallons per day.

the effective daily recovery are of the oil recovery devices is calculated as

$$R=(T)(24\text{hours})(E)$$

$$T= \frac{R}{(24 \text{ hours}) \times (E)}$$

$$(24 \text{ hours}) \times (E)$$

$$T= \frac{2100}{(24) \times 0.020}$$

$$(24) \times 0.020$$

$$T= \frac{437.5 \text{ gallons}}{\text{hour}}$$

hour

R= Effective daily recovery rate

T= Throughput rate

E= 20 percent efficiency factor

Oil storage capacity must be twice the effective daily recovery rate. For a small spill it is twice 2100 gallons per day, or 4200 gallons per day storage capacity. Response contractors can provide the 55 gallon drums or other tanks that would be used for storage. Containment boom, if required, will be deployed by emergency response contractor.

7.2 Response Resources for Medium Spills

A medium discharge is defined to be 36,000 gallons or 10% of the largest above ground storage tank whichever is less. In the sentence the medium discharge amount is 36,000 gallons. Equipment required for a medium spill includes:

- Oil recovery devices with an effective daily recovery rate equal to 50% of the medium spill amount
- Sufficient boom available within the recommended response times
- Storage capacity equivalent to twice the effective daily recovery rate

Environmental factors of weather (heat, rain, wind, snow or ice) must be considered in response and clean-up activities.

Oil recovery devices needed are determined to be:

$$\text{Recovery Rate Needed} = 0.50(36,000\text{gal}) = 18,000 \text{ gal}$$

$$\begin{aligned} \text{Throughput rate} &= \frac{R}{24 \text{ hrs} \times E} \\ &= \frac{18,000 \text{ gal}}{24 \text{ hrs} \times 0.20} \\ &= \frac{3,750 \text{ gal}}{\text{hr}} \times \frac{\text{hr}}{60 \text{ min}} \\ &= \frac{62.5 \text{ gal}}{\text{min}} \end{aligned}$$

Sufficient boom is available within 12 hours as recommended in the final rule (Appendix E, section 4.3).

Extra boom is available from the contractors, if required.

Storage capacity must be equivalent to twice the daily recovery rate or:

$$2 \times 18,000 \text{ gal} = 36,000 \text{ gal}$$

Storage capacity is available in temporary tanks from the contractors.

Medium spill response equipment

- Boom Boom is available from the response contractor
- Recovery equipment Recovery equipment is available from response contractor
- Storage capacity temporary tanks provided by response contractors

In the event of a medium spill coastal personnel will secure cleanup equipment as required. Cleanup will be performed by the emergency contractor. Response effort will be coordinated by the QI.

7.3 Response Resources for Worst Case Spills (part 112, Appendix E, section 7.6.1– 7.7.5)

The worst case discharged for this facility is 2,502,000 gallons or 59,571 barrels.

There may be practical limits on time for (some) resources to arrive on scene. A tiered planning approach is required by regulation. Oil spill response resources must be located such that they are capable of arriving at the scene of the discharge within the time specified for the applicable tier. Response resources required for the first tier of the response effort must be mobilized at the site within 12 hours. Response resources required for the second and third tiers of the response effort must be mobilized at the site within 36 and 60 hours, respectively. Response resources requirements and available equipment are described below.

A Group 5 oil response must be made in 24 hours.

This Plan is for a response of 17.53 miles of river cleanup in a worst case scenario. Final rule dictates 20 miles as a minimum planning distance. Almost all of the planning distance is on a dry creek bed. Environmental factors of weather (heat, rain, wind, snow or ice) must be considered in response and clean-up activities.

The Eleven Point River is a 303D listed losing stream at this location. The stream bed has very little water at this site, mostly consisting of intermittent pools with a rock and sand river bottom. Downstream the river changes into a clear and relatively shallow Ozark water body that originates near Willow Springs, Missouri. Temperature ranges from 2.0 to 30.5 degrees Celsius. Stream width is a low of 60 feet to a high of 210 feet. The stream is fed through a series of underground springs and is classified as a cold water fishery. Group 5 oils will need (in accordance with 40 CFR Ch. 1 part 112, appendix E sections 7.6.1 to 7.6.3) the following appropriate response resources for dealing with a worst case scenario:

- Considering the terrain, depth of the water body and the characteristics of Asphaltic Oil; a medium to large excavator with sufficient bucket size will be the primary recovery tool used in a worst case discharge. Careful placement along stream bank and access to the dry river channel will allow for sufficient reach to recover the Asphaltic Oil.
- Due to the size and given the fact this is a losing stream at the outfall discharge point off of COASTAL property, sonar equipment will not be needed to locate Asphaltic Oils in the unlikely event of a release.
- Containment and diversion tactics will play a key role in suppression of the material prior to a water body. COASTAL has a skid loader and a 1 yard bucket, a 3000 Ford tractor with a box blade, a Caterpillar skid steer with 1 yard bucket attachment, a Case 621 articulating loader with a 3 yard bucket, a 1988 dump truck and other on-site equipment that can be used to quickly contain or divert/ trench or create a small earth containment structure within the confines of the perimeter dike that exists at this facility. Asphaltic Oil must be heated to create enough viscosity so it can be transported. This works to an advantage for recovering and remediation of the area.
- Inclement weather will hamper a recovery operation. More concern will be placed in the spring with significant rainfall events than winter snow and ice. Since the stream is a losing stream, ice on water will not be a concern; however freezing conditions will solidify Asphaltic Oil more quickly. Those same conditions will require extra attention for exposure to cold weather for onsite workers.

- In case of a fire COASTAL has established a cooperative working relationship with the Willow Springs City/Rural fire department and its fire chief Matt Foster. Also available is the District 9 Haz Mat team located in West Plains. Mutual aid agreements exist with other communities should the need for expanded services to contain or fight a significant fire event.

Asphaltic Oil will degrade over time and release some top water sheen. Placement of containment booms and pads will be used to address this issue.

Asphaltic Oil will tend to congregate near the bottom of the stream (when there is sufficient flow), as the spill is remediated, OSRO will adapt and use appropriate response resources, such as vacuum trucks, high capacity oil/water pumps and oil water separators to recover and restore the stream and stream bank.

Oil spill recovery devices should be able to arrive on site according to the following tiered response:

Tier 1	12 hours
Tier 2	36 hours
Tier 3	60 hours

The calculated **on-water recovery capacity** (see calculations in appendix D) is:

Tier 1	9,477 bbls/day
Tier 2	12,992 bbls/day
Tier 3	19,488 bbls/day

Shoreline cleanup volume for worst case discharge is estimated at 2,502,000 gallons or 59,571 bbls/day (see appendix D). Planning as per rule prescribe a plan for two times tier 3 or 38,996 bbls/day.

Sufficient boom and sorbents are available through contractors to sustain a worst case emergency response effort. COASTAL will retain 1000 feet of containment boom on the facility and be prepared to deploy it within an hour of the discovery of a discharge (Part 112, Appendix E 3.3.1).

A response of this magnitude will have to be staged. Although a spill of this magnitude is highly unlikely, the plan will address an adequate level of response. Initial response will include on site personnel, as described throughout this plan, staff will notify the safety officer who will in turn make an assessment of the incident and then make the notification calls to local, state or federal officials as appropriate.

If rendered safe, the on-site personnel will work to contain the spill. Calls will be made to a Qualified Contractor (Environmental Works, Inc.) to deploy to the site and execute the remediation.

Temporary Storage Capacity. In general, storage capacity will be provided by contractors according to the tiered response times listed for the oil spill recovery devices. Empty tank cars may be available on site. The temporary storage capacity will contain twice the effective daily recovery rate or:

Tier 1	9,744 bbls (409,248 gal)	12 hours
Tier 2	12,992 bbls (545,664 gal)	36 hours
Tier 3	19,488 bbls (818,496 gal)	60 hours

Response for worst case discharge is outlined below: (Part 112, Appendix E, 3.1.1)

Boom

Additional boom is available through the response contractor. COASTAL will retain a minimum of 1000 feet of containment boom on site.

Recovery Equipment

- **Tier 1;** 12 hours; 4,943 bbls/day (207,606 gal)
Vacuum trucks or excavators are available from contractor
- **Tier 2;** 36 hours; 6,591 bbls/day (276,822 gal)
Vacuum trucks or excavators are available from contractor
- **Tier 3;** 60 hours; 9887 bbls/day (415,254 gal)
Vacuum trucks or excavators are available from contractor

Storage Capacity

- **Tier 1;** 12 hours; 9,886 bbls/day (415,212 gal)
Frac tanks are available from contractor
- **Tier 2;** 36 hours; 12,992 bbls/day (553,644 gal)
Frac tanks are available from contractor
- **Tier 3;** 60 hours; 19,488 bbls/day (830,508 gal)
Frac tanks are available from contractor

In the event of a worst case discharge, the QI will coordinate response efforts with local, state, federal and contracted resources. COASTAL will initiate a response to contain and control the spill. Contracted emergency responders will perform cleanup operations as outlined in this plan.

7.4 Disposal Plans

Typical disposal methods of potentially contaminated materials are listed below.

Recovered product is pumped to a slop oil tank or container or shipped offsite for recycling.

Contaminated soil is stockpiled and protected onsite for subsequent landfarming, thermal treatment, or disposal at appropriate facilities.

Contaminated equipment and materials, including drums, tanks, parts, valves and shovels are cleaned as appropriate and residues collected.

Personnel protective equipment is drummed and stored as appropriate for disposal.

Sorbents are drummed and stored as appropriate for disposal.

Spent chemicals are drummed and stored as appropriate for disposal.

Disposal locations for contaminated materials will vary depending on type and alternatives that are available. COASTAL intends to recover, reuse, decontaminate, or dispose of materials after a discharge has taken place at the facility. The appropriate permits required to transport or to dispose of recovered materials according to local, state, and federal regulations will be addressed. Additionally, disposal plans will be prepared in accordance with local, state, and federal regulations, where applicable. The response contractor will assist and coordinate appropriate disposal options.

7.5 Containment and drainage planning

The following information addresses facility containment and drainage:

- Available volume of containment at the facility – see section 4.1.5
- Route of drainage from storage and transfer areas – above ground pipe; see section 5 for description of drainage
- Valves used in drainage system, outfall can be closed in case of a spill

- Containment capacity of booms and other equipment that might be used and their locations - see section 3.2

Containment areas (concrete for Ethanol and Fusel AST) are constructed to accumulate rainfall and the contents of the largest storage tanks in case of a leak or spill. An inspection is made of the containment area before drainage of any accumulated rainwater. Contents of the drainage are pumped through a underground pipe and the material is applied onto COASTAL property within the dike area. Drainage of the entire site is kept under responsible supervision. The containment area is inspected routinely.

8.0 SELF INSPECTION, TRAINING, AND MEETING LOGS

Training and meeting logs are included in this response plan to aid facility employees in spill prevention awareness and response training. Logs must be kept for facility QI Notification drills, spill management team tabletop exercises, personnel training and spill prevention meetings. These records are maintained at COASTAL headquarters. Record keeping information in this section is required by existing SPCC regulations. Facility drills and exercises are discussed below:

8.1 Facility Self-inspection

Pursuant to section 112.20 (h)(8) of the file rule, each facility must conduct so inspections and include the written procedures and records of inspections in the SPCC Plan. The inspection should include tanks, secondary containment, and response equipment at the facility. Response equipment is maintained and inventoried by the OSRO. The inspection of tanks and secondary containment is required by the response plan.

Facility self-inspection requires two steps:

- 1) A checklist of items to inspect; and
- 2) A method of recording the actual inspection and its findings.

The date of each inspection shall be noted. These records must be maintained for five years.

Insert form 3 Annual SPCC/ FRP form here

8.1.1 Tank and Secondary Containment

The tank and secondary containment inspection log is presented below as form 2. This form is also provided in the SPCC Plan (for the entire facility with additional information and includes more tanks and storage areas than the FRP covers). Additional blank forms are provided in this plan. Completed inspection forms will be kept behind the completed forms tab at the back of the master copy of this plan.

8.1.2 Response Equipment Checklist

The contracted OSRO or the Environmental Safety Officer will conduct inspections of the response equipment and maintain a record of those inspections, at COASTAL headquarters in this plan. Using the Emergency Response equipment list provided in section 3.2 of this plan, response equipment will be inspected based on the following list:

- Inventory (item and quantity)
- Storage location
- Accessibility (time to access and respond)
- Operational status/condition
- Actual use/testing (last test date and frequency of testing)

- Shelf life (present age, expected replacement date)

Please note any discrepancies between the list and the actual equipment available on Form 8. Blank forms and completed forms are provided behind the respective tabs at the back of the Master Copy of this Plan.

Emergency response contractors are responsible for providing response equipment and maintaining inventory, storage location, operational status, actual use/testing, and shelf life of their response equipment. Partial lists of available contracted response equipment can be found in section 3.2.

Form 4

Spill Response Kit Inspection Checklist

Location (Building Number or Map Reference Code):	
Inspected by:	Title:
Signature:	Date of Inspection:

1. Is the spill kit label missing?	Yes	No
2. Is the spill kit hard to find?	Yes	No
3. Is the spill kit missing:	# if no	
Gloves	Yes	No ____
Goggles	Yes	No ____
Absorbent material	Yes	No ____
4. Is the spill kit open?	Yes	No

Item	expected quantity	on hand
Boom		
Absorbent pads		
oil dry bags		
roll sorbent		
plug kit		
shovels		
rakes		
nitrile gloves		
leather gloves		

For any items above which "Yes" was checked, please comment:

Discrepancies should be brought to the attention of the Spill Contractor who is responsible for maintaining response equipment.

Communication Equipment (including operating frequency and channel and/or cellular phone numbers) are tested on a daily via actual use. Emergency channels will be designated by the Qualified Individual at the time of emergency and during drills.

Form 5

Qualified Individual Notification Log

Date	
Company	
Qualified Individual	
Emergency Scenario	
Evaluation	
Changes to be Implemented	
Timetable for Implementation	

8.2 Facility drills and exercises

COASTAL has developed a program of facility response drills and exercises in accordance with the National Preparedness for Response Exercise Program (PREP) guidelines. The PREP guidelines describe the principals, scopes, and objectives of internal and external exercises. Internal exercises are conducted wholly within the plan holder's organization and those affiliated with contracted OSRO's. These PREP guidelines specify that the facility conduct the following drills and exercises:

(1) Internal exercises

- QI notification drills (quarterly)
- Spill management team tabletop exercises (Annually)
- Equipment deployment exercises for OSRO (annually)
- Annually Unannounced exercises (at least one of the above)

Credit for an area or facility specific exercise will be given to the facility for an actual response to a spill in the area if the plan was used for response to the spill and the objectives of the exercise were met and were properly evaluated, documented, and self-certified. Sections of the PREP Guidelines are included below. Examples of internal exercises are also included in chapter 4 of the PREP guidelines.

Response plan core components to be exercised and evaluated in a triennial cycle are listed in appendix B of the PREP guidelines and in this FRP. The Qualified Individual Notification Drill Log and Spill Management Team Tabletop Exercise Log are also listed in this document. Completed logs will be maintained as a part of this plan by COASTAL.

8.3 Response training

A personnel training log that included a record of all formal response training received by each employee is required by Section 112.20. USCG response training elements for the QI and facility personnel are also included in this document.

Emergency response contractors provide response personnel with the appropriate level of training.

Personnel are properly instructed in the operation and maintenance of equipment to prevent oil discharges. Fuel pumpers are trained in fuel transfer, gauging, and inspection procedures. Supervisors and key employees are trained in handling pollution control. All employees involved in dispensing petroleum products are trained in properly handling procedures.

Form 6

PERSONNEL TRAINING LOG

[illegible]

Form 7
Team Tabletop Exercise Log

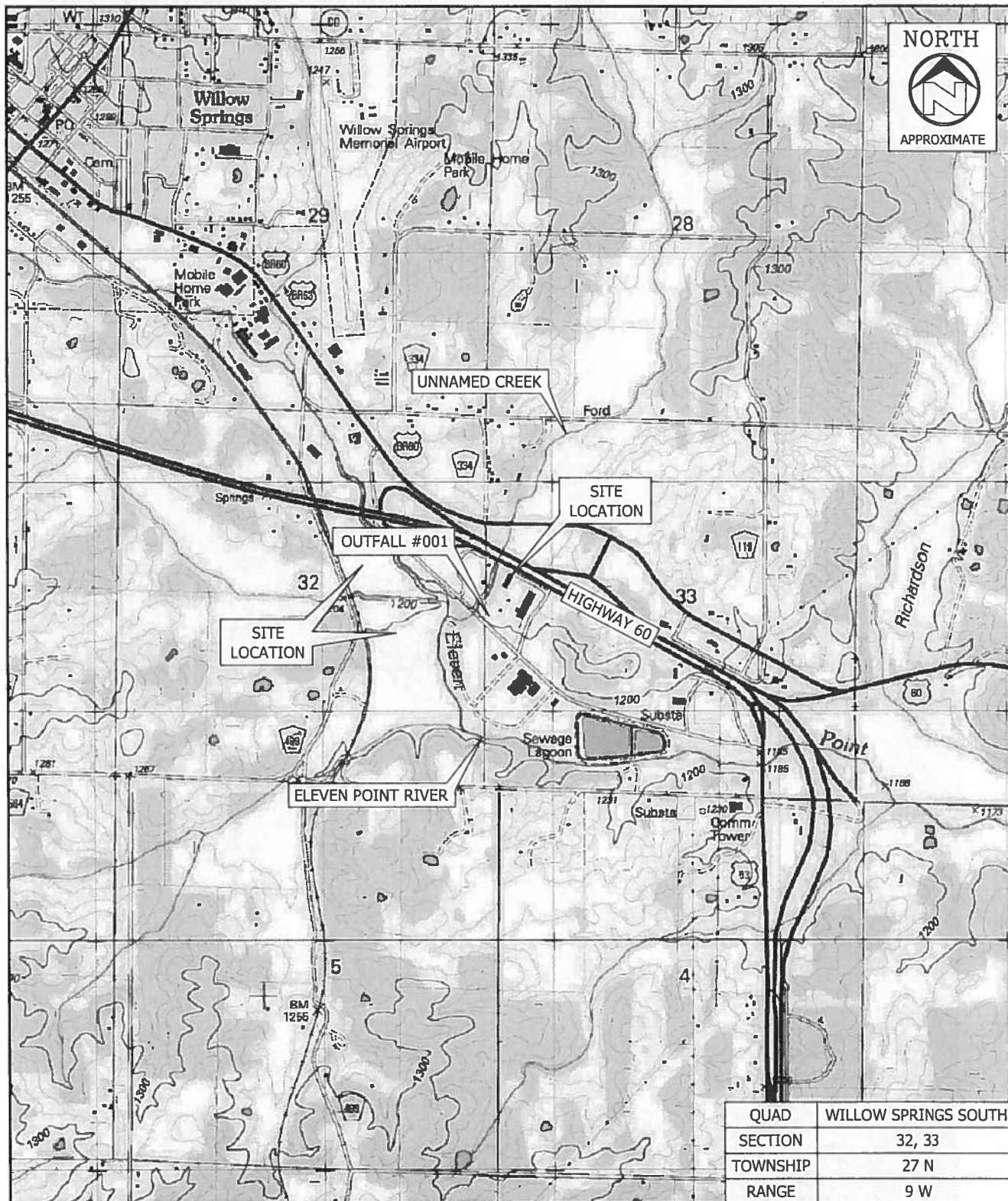
Date	
Company	
Qualified Individual	
Emergency Scenario	
Evaluation	
Changes to be Implemented	
Timetable for Implementation	



9.0 Facility diagram

Figures, 1.0, 2.0 and 3.0





SOURCE: www.mapcard.com (2004)

CHECKED BY:
E. AUSTIN

EWI# 140201
DRAWN BY: MEK
Jul. 2, 2014

SCALE (FEET)

0 1000 2000
APPROXIMATE





ENVIRONMENTAL WORKS
1455 E. Chestnut Expressway, Springfield, MO 65802

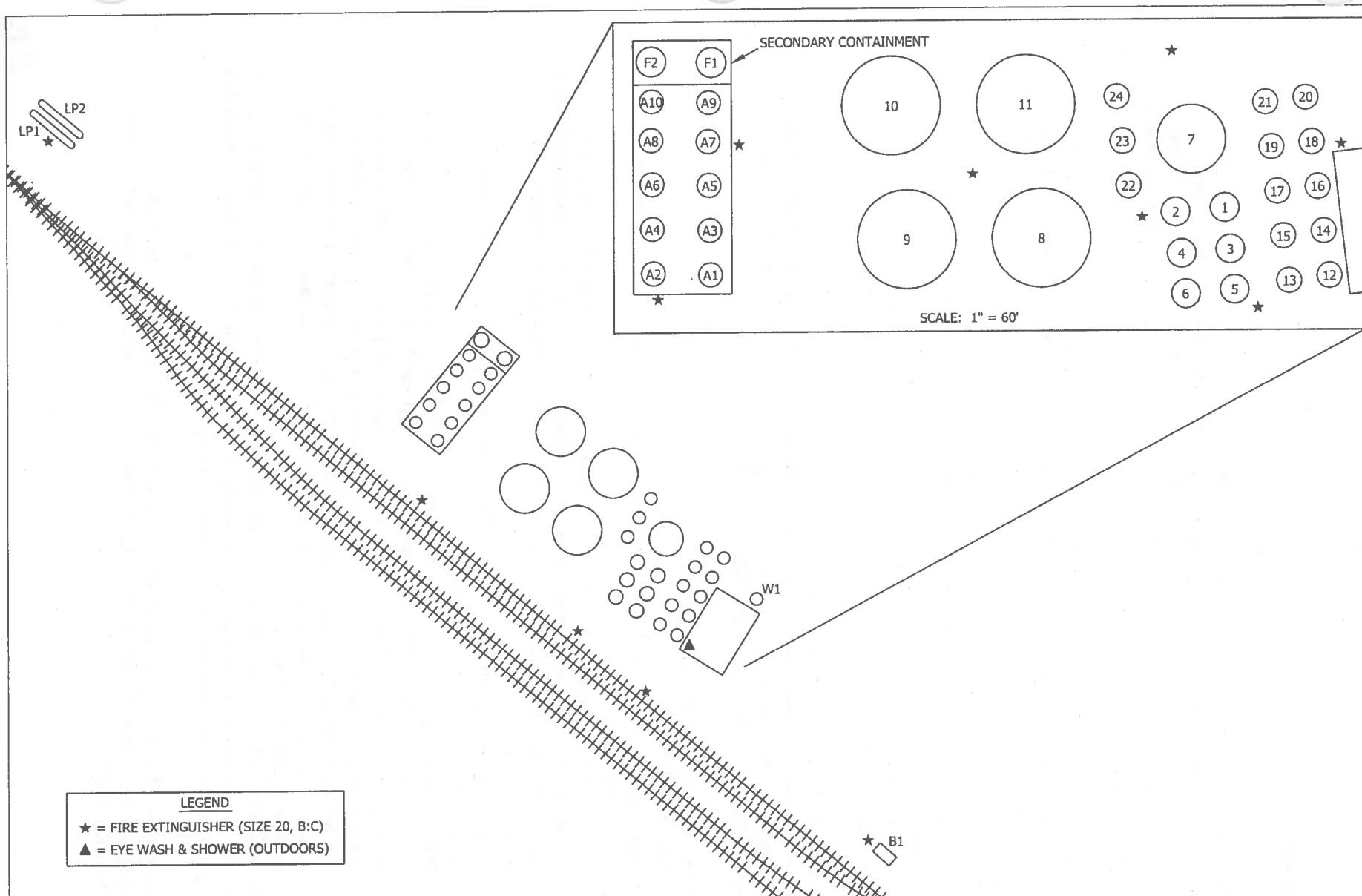
SITE LOCATION-TOPOGRAPHIC MAP

COASTAL ENERGIES CORPORATION
1 COASTAL DRIVE
WILLOW SPRINGS, HOWELL COUNTY, MISSOURI
PERMIT# MO0136883, SIC# 2951

FIGURE
1.0



<p>NORTH</p> 	<p>CHECKED BY: J. MACY</p> <p>E.W.I. # 140201 DRAWN BY: MEK Jul. 2, 2014</p>	<p>SCALE IN FEET</p> <p>0 50 100</p> <p>APPROXIMATE</p>	 <p>Springfield Office Location: 1455 E. Chestnut Expressway Springfield, MO. 65802 Phone: (417) 890-9500</p>	<p>SITE DIAGRAM</p> <p>COASTAL ENERGIES CORPORATION 1 COASTAL DRIVE WILLOW SPRINGS, HOWELL COUNTY, MISSOURI PERMIT # MO0136883, SIC# 2951</p>	<p>FIGURE 2.0</p>
--	--	---	--	---	-----------------------



NORTH



CHECKED BY:
J. MACY

E.W.I. # 140201
DRAWN BY: MEK
May. 23, 2014

SCALE IN FEET

0 60 120

APPROXIMATE



Springfield Office Location:
1455 E. Chestnut Expressway
Springfield, MO 65802
Phone: (417) 890-9500

AST DETAIL DIAGRAM

COASTAL ENERGIES CORPORATION
1 COASTAL DRIVE
WILLOW SPRINGS, HOWELL COUNTY, MISSOURI
PERMIT# MO0136883, SIC# 2951

FIGURE

3.0

10.0 Security

The SPCC Plan regulations requires that a facility describe in your plan how you secure and control access to the oil handling, processing, and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connection of oil pipelines; and address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.

The northern portion of the Coastal Energy facility is protected by a gated fence with while other access points to the facility are controlled by identification card access and security. Buildings and the general exterior of the facility at the Coastal Energy facility are well lit to help deter acts of vandalism and aid personnel in detecting spills.

The Coastal Energy facility is equipped with the following safety measures and deterrents that can prevent a spill:

- A partial fence along Eleven Point River, from front gate to the highway
- 24 hour lighting
- 24 hour video surveillance
- 24 hour alarm on main buildings and shop

When in non-operating or non-standby service, valves that permit direct outward flow from an oil storage container to the surface are to be kept securely locked in a closed position. This can be accomplished by incorporating any of the following methods:

Additional safety practices should include:

- Adding locks directly to padlock wings of the valve,
- Adding locks to hasps, chains, or comparable hardware to the valve operating stem (or operating handle),
- Closing adjacent valves and adding chains and locks to the operating wheels of these valves in such a manner that attempting to open either valve will cause the adjacent valve to rotate in the "close" direction. This technique will prevent the valve from being opened until the lock is removed.
- Locking a sleeve or cover placed over the valve operates so the valve can't be opened or closed until the sleeve or cover is removed.
- Starter controls on all pumps are to be locked in the "off" position when they are in non-operating status. Only authorized personnel are to be allowed access to these controls.
- Loading/unloading connections of oil pipelines and facility piping are to be kept securely capped or blank-flanged when not in service or in standby service for an extended period of time. This may be accomplished by installing a valve at the end of a piping connection and enclosing the valve in a lockable box. Said box shall be so designed that the valve cannot be operated until the box is unlocked and opened.

By Rule, this facility is to be protected by deterrents, such as security fencing, that will discourage acts of vandalism. Fencing has been placed partially around the Facility. Additionally, the loading and unloading rack is placed undercover within a lockable garaged structure.

The facility has a security plan, written in accordance with 49 CFR 172. The U.S. Department of Transportation regulations for handlers or transporters of hazardous materials pertain to the facility's security requirements.

Appendix A

National preparedness for response exercise program (PREP) guidelines

**NATIONAL PREPAREDNESS
FOR
RESPONSE EXERCISE PROGRAM
(PREP)**

GUIDELINES

DEPARTMENT OF TRANSPORTATION
U.S. Coast Guard
Research and Special Programs Administration



ENVIRONMENTAL PROTECTION AGENCY



DEPARTMENT OF THE INTERIOR
Minerals Management Service



August 2002



To the "Response Community":

This is the first revision since August 1994 to the Preparedness for Response Exercise Program (PREP) when we set out together to design an effective and coordinated exercise program under the Oil Pollution Act of 1990. As before, the revisions are the result of an open dialogue and the incorporation of lessons learned over the past 8 years. We considered issues identified in public meetings and in written comments received to the Department of Transportation regulatory docket (2000-7514). The PREP will evolve as the government and industry continue to meet the challenge of protecting the environment, public health and welfare. We look forward to working with all parties as we continue to improve the PREP process.

Captain David Westerholm
Chief, Office of Response
U.S. Coast Guard

Michael B. Cook
Director, Office of Emergency and
Remedial Response
U.S. Environmental Protection Agency

Stacey G. Steward
Associate Administrator for
Pipeline Safety
Research and Special
Programs Administration

Elmer P. Danenberger
Chief, Engineering and Operations
Division
Minerals Management Service

PREP GUIDELINES

Table of Contents

SECTIONS

1. Introduction	1-1
2. Guiding Principles	2-1
3. U.S. Coast Guard-Regulated Vessels and Marine Transportation-Related Facilities	3-1
4. EPA-Regulated Onshore and Certain Offshore Non Transportation-Related Facilities	4-1
5. Onshore Transportation-Related Pipelines	5-1
6. Offshore Facilities	6-1
7. Area Exercises	7-1

APPENDICES...

A. Internal Exercise Documentation Forms	A-1
B. Response Plan Core Components	B-1

SECTION 1: INTRODUCTION

Purpose

The National Preparedness for Response Exercise Program (PREP) was developed to establish a workable exercise program which meets the intent of section 4202(a) of the Oil Pollution Act of 1990 (OPA 90), amending section 311 (j) of the Federal Water Pollution Control Act (FWPCA), by adding a new subsection (6) and a new subsection (7) for spill response preparedness [33 U.S.C. 1321 (j)]. The PREP was developed to provide a mechanism for compliance with the exercise requirements, while being economically feasible for the government and oil industry to adopt and sustain. The PREP is a unified federal effort and satisfies the exercise requirements of the Coast Guard, the Environmental Protection Agency (EPA), the Research and Special Programs Administration (RSPA) Office of Pipeline Safety, and the Minerals Management Service (MMS). Completion of the PREP exercises will satisfy all OPA 90 mandated federal oil pollution response exercise requirements.

PREP addresses the exercise requirements for oil pollution response. At this time, Coast Guard is the only one of the four participating federal agencies considering regulations requiring HAZSUB response planning and exercises under the Federal Water Pollution Control Act and the Oil Pollution Act of 1990. Therefore, the HAZSUB exercise standards described in Section 3 of the Guidelines apply only to CG-regulated vessels and facilities in accordance with 33 CFR 154/155. There are additional industry planning and exercise requirements contained in other federal statutes, which are not addressed in these Guidelines.

The PREP represents the **minimum** guidelines for ensuring adequate response preparedness. If personnel within an organization believe additional exercises or an expansion of the scope of the PREP exercises are warranted to ensure enhanced preparedness, they are **highly encouraged** to conduct these exercises.

The PREP exercises should be viewed as an opportunity for continuous improvement of the response plans and the response system. **Plan holders are responsible for addressing any issues that arise from evaluation of the exercises and for making changes to the response plans necessary to ensure the highest level of preparedness.**

Participation in PREP

Plan holders are required to meet the pollution response exercise requirements mandated by the federal agency with regulatory oversight for the specific type of industry involved (e.g., vessels, marine transportation-related facilities, onshore and certain offshore non transportation-related facilities, pipelines, offshore facilities). The PREP satisfies these requirements. **The PREP is a voluntary program.** Plan holders are not required to follow the PREP guidelines and, if they choose not to, may develop their own exercise program that complies with the regulatory exercise requirements.

All plan holders, whether participating in the PREP or following the exercise mandates of relevant agency regulations, will be subject to government-initiated unannounced exercises. Unannounced exercises are mandated by OPA 90. These exercises are further described in these guidelines.

Applicability

The PREP is applicable to all industry response plan holders who elect to follow these guidelines. Area Contingency Plan holders are required to follow the PREP guidelines.

Industry plan holders electing not to adopt the PREP as their exercise program will be responsible for developing and documenting an exercise program that satisfies the appropriate federal oversight agency.

If an industry plan holder has developed one response plan that covers a fleet of vessels or regional operations of offshore platforms, this plan holder would only be required to conduct one "set" of exercises for the plan, with the exception of the qualified individual notification exercises and the emergency procedures exercises, which are required for all manned vessels and unmanned barges (as specified in 33 CFR155.101 5).

Effective Date

THE PREP GUIDELINES BECAME EFFECTIVE JANUARY 1, 1994. THE PREP FOLLOWS THE CALENDAR YEAR - THE EXERCISE YEAR IS JANUARY 1 TO DECEMBER 31.

Definitions

❏ **Area** - That geographic area for which a separate and distinct Area Contingency Plan has been prepared, as described in the Oil Pollution Act of 1990. For EPA Areas with sub - area plans or annexes to the Area

Contingency Plan, the EPA Regional Administrator shall decide which sub-area plan is to be exercised within the triennial cycle.

❏ **Area Committee** - Area Committees are those committees comprised of federal, state and local officials, formed in accordance with section 4202 of the Oil Pollution Act of 1990, whose task is to prepare an Area Contingency Plan for the area for response to a discharge of oil or hazardous substance.

❏ **Area Spill Management Team** - The Area Spill Management Team is the group of individuals within the Coast Guard or EPA On-Scene Coordinator organization with responsibility for spill response management within the respective area. The Area Spill Management Team should include state and local personnel whenever possible.

❏ **Barge Custodian** - A barge custodian is the individual that has custody of an unmanned barge. The barge custodian may be affiliated with the towing vessel, fleeting area or facility at which the barge may be moored. The custodian can be the towing vessel operator, the facility operator, the fleet operator, or whoever may be in charge of the entity that has custody of the barge.

❏ **Certification** - Certification is the act of confirming that an exercise (1) was completed; (2) was conducted in accordance with the PREP guidelines, meeting all objectives listed; and (3) was evaluated using a mechanism that appraised the effectiveness of the response or contingency plan.

❏ **Complex** - A complex is a facility regulated under section 311 (j) of the Federal Water Pollution Control Act [33 U.S.C. 1321 (j)] by two or more federal agencies.

❏ **Equipment deployment exercise** - An equipment deployment exercise is an exercise where response equipment is deployed to a specific site and operated in its normal operating medium.

❏ **Equipment activation** - Equipment activation is the movement, staging, deployment or operation of response equipment, as determined by the plan holder in consultation with the exercise design team.

❏ **Exercise Design Team** - This team is comprised of federal, state and industry representatives who have responsibility for designing an Area Exercise.

❏ **Hazardous Substance** - For the purposes of PREP Section 3, the chemicals for which plan holders are required to prepare response plans by the Coast Guard under 33 CFR 154, 155 .

❏ **Hazardous Substance Response Organization (HSRO)** - For the purposes of PREP Section 3, HSRO refers to companies involved with hazardous substance response, removal, and remediation. This acronym does not suggest the same classification standards that are required by OSROs.

❏ **Industry** - For the purpose of these guidelines, industry means the vessels, marine transportation-related (MTR) facilities, onshore and certain offshore non - transportation-related facilities, pipelines, and Outer Continental Shelf platforms for which response plans for oil spill response are required to be submitted by owners or operators. The response plan requirements and regulations for these entities are administered by the Coast Guard, EPA, RSPA, and MMS.

❏ **National Response System** - Under 40 CFR part 300 (The National Oil and Hazardous Substances Pollution Contingency Plan), the National Response System (NRS) includes the National Response Team, Regional Response Teams, Area Committees, On-Scene Coordinators, and state and local government entities involved with response planning and coordination. The PREP, consistent with OPA 90 objectives, specifically involves the private sector with the NRS in order to ensure effective exercise development, delivery and coordination.

❏ **Oil Spill Removal Organization (OSRO)** - An oil spill removal organization is an entity that provides response resources. An oil spill removal organization includes, but is not limited to, any for-profit or not-for-profit contractor, cooperative, or in-house response resources established in a geographic area to provide required response resources.

❏ **On-Scene Coordinator (OSC)** - The On-Scene Coordinator is the federal official predesignated by EPA or the USCG prior to an oil spill to coordinate and direct federal responses under subpart D of the National Contingency Plan, or the official designated by the lead agency to coordinate and direct removal actions under subpart E of the National Contingency Plan.

❏ **Operating Environments** - For the purposes of PREP, there are three types of operating environments [33 CFR 154, 33 CFR 155, 40 CFR 112]:

- ◆ River and canals

- ◆ Great Lakes/ Inland

- ◆ Ocean (nearshore, offshore, and open ocean)

If an OSRO operates in all three environments, the OSRO is required to conduct an exercise of the minimum amount of equipment in each of the environments. If the OSRO only operates in two of the environments, it must conduct the exercises in the two environments.

❏ **Plan Holder** - The plan holder is the industry (e.g., vessels, MTR facilities, onshore and certain offshore non-transportation-related facilities, pipelines, or offshore facilities) for which a response plan is required by federal regulation to be submitted by a vessel or facility's owner or operator. If an owner or operator is authorized to prepare one plan for a fleet of vessels, that owner or operator is considered to be the plan holder.

Planning Volumes for Oil :

1. **Average Most Probable (USCG) / Small (EPA) Discharge:** - This definition is agency-dependent, and the appropriate definitions are detailed as follows:

- ◆ For Coast Guard-regulated vessels, a discharge of 50 barrels [2,100 gallons] of oil from the vessel during oil transfer operations [33 CFR 155.1020].
- ◆ For Coast Guard-regulated facilities, a discharge of the lesser of 50 barrels [2,100 gallons] or 1 percent of the volume of the worst-case discharge [33 CFR 154.1020].
- ◆ For EPA regulated facilities, a small discharge is a volume of 2,100 gallons [50 barrels] or less, provided this amount is less than the worst-case discharge [40 CFR 112.20].
- ◆ For RSPA - Not applicable
- ◆ For MMS - Not applicable

2. **Maximum Most Probable (USCG) / Medium (EPA) Discharge:** - This definition is agency-dependent, and the appropriate definitions are detailed as follows:

- ◆ For Coast Guard-regulated vessels, a discharge of 2,500 barrels [105,000 gallons] of oil for vessels with an oil cargo capacity equal to or greater than 25,000 barrels [1,050,000 gallons], or 10 percent of the vessel's oil cargo capacity for vessels with a capacity of less than 25,000 barrels [1,050,000 gallons] [33 CFR 155.1020].
- ◆ For Coast Guard-regulated facilities, a discharge of the lesser or 1,200 barrels [50,400 gallons] or 10 percent of the volume of a worst-case discharge [33 CFR 154.1020].
- ◆ For EPA-regulated facilities, a discharge greater than 2,100 gallons [50 barrels] and less than or equal to 36,000 gallons [858 barrels] or 10 percent of the capacity of the largest tank at the facility, whichever is less [40 CFR 112.20].
- ◆ For RSPA-Not applicable.
- ◆ For MMS-Not applicable.

***Although this type of spill is not included as a spill to be used in any of the exercises, the definition is included to remind the program participants that this spill type is included in the planning process and can be used when conducting the various exercises.**

3. **Worst Case Discharge** - This definition is agency-dependent, and the appropriate definitions are detailed as follows:

- ◆ For Coast Guard-regulated vessels, a discharge in adverse weather conditions of a vessel's entire cargo as defined in 33 CFR 155.1020.
- ◆ For Coast Guard-regulated facilities, the size of the discharge as defined in 33 CFR 154.1020 (in the case of an onshore facility and deepwater port, the largest foreseeable discharge in adverse weather conditions meeting the requirements of 33 CFR 154.1029).
- ◆ For EPA-regulated facilities, the size of the discharge described in 40 CFR 112.20.

- ◆ For RSPA-regulated pipelines, the size of the discharge as defined in applicable regulations [49 CFR 194].
- ◆ For MMS-regulated offshore facilities, the size of the discharge as defined in applicable regulations [30 CFR 254].
- ◆ For Areas, the size of the discharge as defined in the Area Contingency Plan.
- ◆ For complexes regulated by more than one federal agency, the largest of the worst-case discharges calculated for the various regulated components.
- ◆ Planning Volumes for HAZSUB – Applies to Section 3 only.

4. **Worst Case Discharge (vessel)** - means a discharge of a vessel's entire hazardous substance cargo during adverse weather conditions [33 CFR 155.3030]. In addition, planning contingencies should also anticipate situations where a vessel does not lose the entire cargo but the consequences of the release present a significant and substantial risk to human health or the environment. Furthermore, a company must be prepared to respond to any individual chemical it is authorized to carry.
5. **Worst Case Discharge (Coast Guard-regulated facility)** – means a discharge of the entire volume of the largest hazardous substance cargo line (including the content of any associated breakout tanks) measured from the transfer manifold on the dock to the first valve inside the secondary containment of the facility.

☐ **Personal Protective Equipment** - equipment that meets the requirements contained in OSHA Hazardous Waste Regulations 29 CFR 1910.120.

☐ **Primary Oversight Agency** - The primary oversight agency is the agency with regulatory authority over a particular industry. For the purposes of the PREP, the four primary oversight agencies and the industries they regulate are the U.S. Coast Guard (vessels, MTR facilities), the Environmental Protection Agency (onshore and certain offshore non transportation-related facilities), the Research and Special Programs Administration (pipelines), and the Minerals Management Service (offshore facilities).

☐ **Qualified Individual** - A qualified individual is the person located in the United States who meets the requirements identified in the respective federal regulations (USCG, EPA, RSPA, MMS), and who is authorized to do

the following: (1) activate and engage in contracting with oil spill removal organizations; (2) act as a liaison with the On-Scene Coordinator; and (3) obligate funds required to effectuate response activities. The qualified individual will be the individual or a designee identified in the response plan.

✧ **Self-Certification** - Self-certification is where the plan holder declares he or she has met the following standards: (1) completion of the exercise; (2) conducting of the exercise in accordance with the PREP guidelines, meeting all objectives listed; and (3) evaluation of the exercise using a mechanism that appraises the effectiveness of the response or contingency plan.

✧ **Self-Evaluation** - Self-evaluation means that the plan holder is responsible for carefully examining the effectiveness of the plan for response during the exercise. The plan holder may choose the mechanism for conducting this appraisal, as long as it appropriately measures the plan effectiveness. The plan holder is responsible for addressing issues that arise in the exercise that would lead to improvements in the response plan or any aspect of preparedness for spill response. The plan holder is responsible for incorporating necessary changes to the response plan as a result of the exercise.

✧ **Spill Management Team** - The spill management team is the group of personnel identified to staff the appropriate organizational structure to manage spill response implementation in accordance with the response plan.

✧ **Tabletop Exercise** - For the purpose of the PREP, a tabletop exercise is an exercise of the response plan and the spill management team's response efforts without the actual deployment of response equipment.

✧ **Timely** - (as used in relation to CG and EPA government-initiated unannounced exercise programs) means the times established in the appropriate response planning regulations issued by the EPA and USCG for providing response resources to a small or average most probable spill.

✧ **Unified Command** - This entity is a command structure consisting of the On-Scene Coordinator, the State, the Responsible Party and other parties as appropriate. The Unified Command is utilized during a spill response to achieve the coordination necessary to carry out an effective and efficient response.

✧ **Verification** - Verification is the act of ensuring that an exercise was properly documented and certified. Verification would be conducted by the Coast Guard, EPA, RSPA, or MMS. Verification of the exercise records may be conducted through normal operations of the regulatory agency, such as

inspections, boarding, spot checks, or other systems developed to ensure exercises are being conducted and properly documented.

✧ **Vessel** - For the purpose of the oil spills, a "vessel" is any vessel required by 33 CFR 155.1015 to submit a response plan. For the purpose of hazardous substance releases, a "vessel" is any vessel required by 33 CFR 155.3030 to submit a response plan. A "vessel" includes unmanned barges.

SECTION 2: GUIDING PRINCIPLES

Internal and External Exercises

→ Internal Exercises.

Internal exercises are those that are conducted wholly within the plan holders organization. While the internal exercises include personnel such as the qualified individual and those affiliated with the plan holder's spill management team, OSRO, the internal exercises usually do not involve other members of the response community. The internal exercises are designed to examine the various components of the response plan to ensure the plan is adequate to meet the needs of the organization for spill response.

The **Internal** exercises include --

- ◆ Qualified individual notification exercises;
- ◆ Emergency procedures exercises for vessels and barges;
- ◆ Emergency procedures exercises for facilities (optional);
- ◆ Spill management team tabletop exercises; and
- ◆ Equipment deployment exercises.

All internal exercises should be **self-evaluated** and **self-certified**.

→ External Exercises.

External exercises are exercises that extend beyond the internal focus of the plan holder's organization, and involve other members of the response community. The external exercises are designed to examine the response plan and the plan holder's ability to coordinate with the response community to conduct an effective response to a pollution incident.

The **external** exercises include--

- ◆ Area exercises; and
- ◆ Government-initiated unannounced exercises.

While the government-initiated unannounced exercises will not usually

involve all members of the response community, the involvement of an agency outside of the plan holders' organization places it in the category of an external exercise.

Qualified Individual Notification Exercises

The purpose of the qualified individual notification exercise is to ensure that the qualified individual (or designee, as designated in the response plan) is able to be reached in a spill response emergency to carry out his or her required duties. Contact by telephone, radio, message-pager, or facsimile must be made with the qualified individual, and confirmation must be received from him or her to satisfy the requirements of this exercise.

The qualified individual notification exercise is not intended to verify phone numbers, points of contact or the notification list contained in the plan. The plan holder is expected to update the notification list periodically (recommended at least once every 6 months) as part of the normal course of conducting business.

At least once a year, the qualified individual notification exercise should be conducted during non-business hours.

→ Vessels.

For vessels, it is the responsibility of the plan holder to ensure that the qualified individual notification exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that each vessel in the fleet conducts this exercise.

For vessels, a telex will be acceptable, but the baseline should be voice communication. If a telex is used for this exercise, confirmation from the qualified individual must be received to properly satisfy the requirements of this exercise.

→ Unmanned Barges.

For unmanned barges, it is the responsibility of the plan holder to ensure that the qualified individual notification exercise is conducted. If a plan holder has a fleet of unmanned barges covered by one response plan, during each quarter the plan holder should randomly choose a barge in the fleet to conduct the qualified individual notification exercise.* The plan holder should have the barge custodian of the chosen barge conduct the exercise. The plan holder should choose the barges and the various custodians randomly. This method

will ensure that all barges and custodians are ultimately included in the exercises.

***To require each unmanned barge in a fleet to conduct this exercise quarterly would be extremely difficult and unwieldy to manage.**

Emergency Procedures Exercises

The purpose of the emergency procedures exercises is to ensure that personnel are capable of conducting the initial actions necessary to mitigate the effects of a spill.

→ Vessels.

For vessels, it is the responsibility of the plan holder to ensure that the emergency procedures exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that each vessel in the fleet conducts this exercise. Since vessels do not always sail with the same crews, it is important that each vessel conducts this exercise quarterly to ensure that the personnel on board are familiar with the procedures for mitigating a spill occurring from that vessel.

→ Unmanned barges.

For unmanned barges, it is the responsibility of the plan holder to ensure the emergency procedures exercise is conducted.

***To require each unmanned barge in a fleet to conduct this exercise quarterly would be extremely difficult and unwieldy to manage.**

If a plan holder has a fleet of unmanned barges covered by one response plan, during each quarter the plan holder should randomly choose a barge in the fleet to conduct the emergency procedures exercise. The plan holder should have the barge custodian of the chosen barge conduct the exercise. The plan holder should choose the barges and the various custodians randomly to ensure that all barges and custodians will ultimately be included in the exercises.

→ Facilities (optional).

Facilities have the option of conducting emergency procedures exercises. For the purpose of the PREP, emergency procedures for facilities are the procedures established at the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil resulting from facility operational

activities associated with cargo transfers. An emergency procedures exercise conducted unannounced would satisfy the facility's requirement for the annual unannounced exercise.

Spill Management Team Tabletop Exercises

The response plan holder must identify a spill management team in the response plan. This spill management team shall conduct an annual tabletop exercise, in accordance with the PREP guidelines. The response plan must be utilized in the exercise to ensure the spill management team is familiar with the plan and is able to use it effectively to conduct a spill response. At least one spill management team tabletop exercise in a triennial cycle shall involve a worst-case discharge scenario.

If a response plan lists different types of spill management teams for varying sizes of spills - for example a local spill management team for small spills, a regional team for larger spills, and a national team for major spills-each team identified would be required to conduct an annual spill management team tabletop exercise.

→ Examples of Variations in Spill Management Team Organizations.

If an organization has one national spill management team identified for all plans within the organization, that spill management team would only have to conduct one spill management team tabletop exercise annually, as long as the TTX addresses individual responses to spill scenarios for all type of industry plan holders covered by the SMT, i.e. vessels, facilities, pipelines and offshore facilities. For the annual spill management team tabletop exercise, the spill management team may use core response management procedures that would cover all plan holders, but the SMT must ensure it is familiar with each response plan for the vessels, facilities, pipelines and offshore facilities for which they are responsible, including the specific spill scenarios identified in each of the plans as well as the specific operations of each of the vessels, facilities, pipelines and offshore facilities. All plan holders that cite this national team in their response plans should take credit for this exercise.

Likewise, if regional spill management teams are set up within the organization, each regional team would only have to conduct one spill management team tabletop exercise annually, as long as the TTX addresses individual responses to spill scenarios for all types of industry plan holders covered by the SMT, i.e. vessels, facilities, pipelines and offshore facilities. The spill management team may utilize core response management procedures that would cover all plan holders, but the spill management team must ensure it is familiar with each response plan for which they are

responsible, including the specific spill scenarios identified in each of the plans as well as the specific operations and unique characteristics of each of the vessels, facilities, pipelines and offshore facilities. All plan holders that cite this regional team in their response plans should take credit for this exercise.

If a plan holder uses a core spill management team to handle most spills and adds personnel to the team as the size of the spill increases, either locally or from regional locations, the entire expanded spill management team must be exercised annually.

The spill management team tabletop exercises should take into account shift changes to ensure that all personnel serving as part of the spill management team during an actual spill have participated in an exercise.

If a plan holder cites a spill management team that is not part of the plan holder's organization, i.e. "SMT for hire", that spill management team would only be required to conduct one spill management team tabletop exercise annually, as long as the TTX addresses individual responses to spill scenarios for all types of industry plan holders covered by the SMT, i.e. vessels, facilities, pipelines and offshore facilities. One or more representatives from each plan holder organization that the spill management team represents must participate in the exercise. During the spill management team tabletop exercise, the spill management team must utilize each response plan to ensure familiarity with the spill scenarios identified in each of the plans as well as the specific operations of each vessel, facility, pipeline, and offshore facility the spill management team represents. The spill management team must also work with each plan holder representative to ensure the spill management team is able to incorporate the response management operations into the plan holder's organization during spill response. The spill management team should provide all plan holders with documentation upon completion of the spill management team tabletop exercise, and each plan holder should take credit for the exercise.

→ Vessels.

For vessels, if a plan holder has one response plan for a fleet of vessels and cites the same spill management team for more than one or all of the plans, the spill management team would only have to conduct one spill management team tabletop exercise annually, as long as the core response plan is used in the exercise and the spill management team demonstrates knowledge of the geographic specific annexes of the vessels during the exercise. All vessel plan holders in the fleet citing this spill management team should take credit for the annual exercise.

→ Pipelines.

For pipelines, the spill emergency response team is the spill management team.

Equipment Deployment Exercises

The equipment deployment exercise applies to all plan holders. It is the responsibility of the plan holder to ensure that the Equipment Deployment Exercise requirement is met.

The two primary requirements for the equipment deployment exercise are:

1. The personnel that would normally operate or supervise the operation of the response equipment must participate in the exercise. The personnel must demonstrate their ability to deploy and operate the equipment, while wearing appropriate personal protective equipment. All personnel involved in equipment deployment and equipment operators must be involved in a training program.
2. The response equipment must be in good operating condition. The equipment must be appropriate for the intended-operating environment. The equipment must operate during the exercise. All response equipment must be included in a maintenance program.

Although not required as part of the equipment deployment exercises, plan holders are encouraged to use these exercises as an opportunity to validate response strategies detailed in response/contingency plans for the geographic area where the exercise is being conducted.

A plan holder is responsible for ensuring exercise of all equipment types cited in the plan whether plan holder owned or provided through an OSRO.

The purpose of the equipment deployment exercise is to validate that the equipment is appropriate for the operating environment in which it is intended to be used and that operating personnel are trained and capable of its deployment and operation. Thus it is not necessary to deploy every piece of each type of equipment as long as all equipment is included in a periodic inspection and maintenance program intended to ensure the equipment remains in good working order. However, all operating personnel must participate in exercises or responses on an annual basis in order to ensure they remain trained and qualified to operate equipment in the operating environment.

Note that the CG applies the same standards to HSRO owned equipment deployment exercises as described below for OSROs.

→ OSRO Involvement in Equipment Deployment Exercises.

The PREP guidelines identify the minimum amount of equipment that must be deployed in an equipment deployment exercise. This amount is considered to be a representative sample of the equipment. The rationale for this approach is that if the representative sample works, then the rest of the equipment could be expected to work since it would be part of the company's maintenance program. For the personnel, if a representative sample of the OSRO's personnel are involved in the deployment exercise and handle their responsibilities effectively, the rest of the personnel could be expected to be knowledgeable and effective since they would be a part of the company's training program. *When selecting the equipment and personnel for the exercise, the OSRO should ensure that the same equipment and personnel are not used repeatedly for each exercise. The equipment should be selected on a rotational basis, as with the personnel, with the ultimate goal of eventually exercising all of the OSRO's equipment and personnel.*

If an OSRO has separate field response facilities located throughout the country in areas that do not lend themselves to regional consolidation, each staffed field response facility, for the purpose of the PREP, will be considered a separate OSRO and will be required to conduct an annual equipment deployment exercise of the minimum amount of equipment specified in the in the PREP.

In both cases, if the OSRO is classified to deploy equipment to more than one type of operating environment, the OSRO must conduct a deployment exercise in each of the environments.

A few of the larger OSROs have small field response facilities. A field response facility is defined as a location where personnel and equipment are staged. Some of these OSROs have divided their operations into regional response facilities. In some instances, a regional facility will be responsible for several small field response facilities or equipment stockpiles. For the purpose of the equipment deployment exercises under the PREP, **each regional facility** will be considered a separate OSRO and will be required to conduct an annual equipment deployment exercise of the minimum amount of equipment specified in the PREP. The OSRO regional facility would be responsible for coordinating resources from all field facilities within the region for the exercise. In such instances, equipment may be drawn from one or more field facilities, but personnel from each field facility must participate in the equipment

deployment exercise. If the OSRO operates using regional facilities, the OSRO will be responsible for defining its regional boundaries and providing information to its plan holders. Generally, however regions should be reasonable in geographic size. At a minimum, plan holders must ensure their OSRO(s) conduct annual equipment deployment exercises in each operating environment in which they expect to operate for each CG District or Regional Response Team Regions and EPA Area Contingency Planning area, or EPA sub-area (where identified), unless adjoining areas or sub-areas authorize an alternative. For example, if an OSRO is located in the First CG District, and provides response assets to the Fifth CG District as well those two might mutually agree to allow the OSRO to conduct fewer exercises due to similarity of operating environments in those areas and opportunity to observe the exercises. The OSRO should request this consideration in writing from the appropriate Contingency Planning Area and sub-area.

If the OSRO is cited in a response plan outside of its normal equipment staging and operating areas (i.e. as a Tier 2 responder), the plan holder citing that OSRO must ensure that the OSRO has the local knowledge relevant to an effective, efficient response in the plan holder's operating area. The plan holder must describe arrangements for providing the OSRO with information such as equipment launching locations, tides and currents of the local area, and any other logistical problems or information specific to the particular area.

The OSRO should provide documentation of completion of the exercise requirements to each plan holder covered by that OSRO. It is the plan holder's responsibility to ensure that the OSRO has completed the equipment deployment exercise requirements and has obtained the necessary documentation. All plan holders identifying an OSRO in their response plans as providing response resources should take and document their credit for completing the equipment deployment exercise requirements once documentation is received from the OSRO. All plan holders must remember that merely citing an OSRO in their response plan is not sufficient to ensure credit for the equipment deployment exercise.

→ Cooperatives (Co-ops).

For co-ops that are comprised of several OSROs, each separate OSRO that makes up the co-op would be required to conduct an annual equipment deployment exercise of the minimum amount of equipment listed below.

For co-ops that are comprised of facility equipment and personnel pooled together, for the purposed of the PREP, this type of co-op is considered an OSRO and would be required to conduct the equipment deployment exercise as outlined in the OSRO section. This co-op, which is formed by a

number of facilities pooling their response equipment and personnel together, would be required to conduct an equipment deployment exercise of the minimum amount of equipment listed below annually. Each facility and the personnel will not have to conduct the exercise individually. The co-op as a whole would conduct one equipment deployment exercise per year. Representatives from all of the facilities comprising this co-op must participate in this exercise.

Co-op personnel that are responsible for deploying the response equipment must be involved in a training program, which prepares them for operating the response equipment. Likewise, the Co-op must have a maintenance program for all of the response equipment.

→ **Vessel and Facility Plan Holder Owned and Operated Equipment.**

Plan holder owned and operated equipment is that equipment owned by a plan holder and operated either by the plan holder's own personnel or other personnel hired by the plan holder to operate this equipment. Whoever operates this equipment must be involved in the equipment deployment exercises.

Plan holders that have plan holder owned and operated equipment, and have this equipment identified in their response plan for spill response, would be required to deploy this equipment twice a year (semiannually). The plan holder would be required to deploy the minimum amount of equipment for deployment specified below or the total amount of equipment that plan holder has available for response, whichever is less. The requirement for semiannual equipment deployment is based on the fact that this equipment is not deployed routinely and that the personnel operating it do not do this as a part of the vessel's or facility's normal operations. The semiannual requirement is necessary to ensure adequate preparedness for spill response.

The plan holder's personnel responsible for deploying the response equipment must be involved in a training program which prepares them for operating the response equipment. Likewise, the vessel/facility plan holder must have a maintenance program for all of the response equipment.

→ **Plan Holders Using a Combination of OSRO Equipment and Plan Holder Owned and Operated Equipment**

Plan holders citing both OSRO equipment and their own equipment in their response plans would be required to exercise both types of equipment at the above described intervals.

→ **Minimum Amount of Equipment to be Deployed in Internal Equipment Deployment Exercises.**

I. Hazardous Substance Incident Assessment Equipment used in the initial assessment and response to hazardous substance releases. Note that this type of equipment is not required by regulation for oil spill response.

- a) Monitoring- Air, surface and subsurface plume monitoring equipment.
- b) Personal Protective Equipment-Protective clothing, protective breathing apparatus appropriate to protecting responders in the environments to which they might be exposed in responding to a release
- c) Technical Equipment - Used for trajectory analysis.

→ **Oil and Hazardous Substance Response Systems.**

A) Mechanical - Skimming/Recovery Systems - One of each type of Skimming System as listed in the plan. A Skimming System includes containment boom, hoses, piping, pumps, prime movers, support vessels, etc. necessary for the effective operation of that system.

Types of Skimming/Recovery Systems include:

- Oleophilic - Brush
- Oleophilic - DiscOleophilic - Paddle Belt
- Oleophilic - Rope Mop
- Oleophilic - Sorbent Lifting Belt
- Oleophilic - Submersion Belt
- Oleophilic - Submersion Plane
- Suction (including vacuum trucks)
- Weir
- Advancing Weir

- Special Purpose skimmers (e.g. fast water)

B) In-Situ Burn Systems – Each ISB package listed in the plan and relied on by the plan holder in meeting response equipment capability requirements - including boom, method of ignition, support vessels and smoke plume monitoring equipment. Deployment or use of in situ-burning should not occur during the exercise unless directed by the Federal On-Scene Coordinator.

C) Dispersant Systems – Each dispersant package listed in the plan and relied on by the plan holder in meeting response equipment capability requirements, including dispersant delivery vehicles, application equipment, and dispersed oil plume monitoring equipment. Deployment or use of the actual dispersant should not occur during the exercise unless directed by the Federal On-Scene Coordinator.

II. Booming Systems (includes protective and containment boom not exercised as part of a skimming or in-situ burning system described above) 1,000 feet (or total amount of boom listed in plan, whichever is less) of each protective or containment boom system listed in the plan and relied on by the plan holder in meeting response equipment capability requirements. Protective boom systems (boom and means of deploying and anchoring) include the following types:

- Fence Boom
- Curtain Boom: internal foam; external foam, self-inflatable and pressure inflatable.
- External Tension Boom
- Tidal Seal Boom (**Only 50 feet of this type of boom need be deployed.**)
- Special Purpose
- -Ice Booms

***Fast Water Booms (Equipment and/or techniques intended to improve spill containment, control in fast water situations).**

→ Area Equipment Deployment. (Oil only).

The area equipment deployment exercise involves Coast Guard and EPA "first aid" response equipment and the Coast Guard's prepositioned equipment. All of the "first aid" equipment or that which is necessary to respond to an average most probable discharge in the area, whichever is less, would be deployed annually.

Internal Unannounced Exercises

THIS IS NOT A SEPARATE EXERCISE. THIS SECTION OUTLINES THE REQUIREMENT THAT ONE OF THE PREP EXERCISES USED BELOW MUST BE CONDUCTED UNANNOUNCED.

Annually, each plan holder should ensure that one of the following exercises is conducted unannounced:

- ♦ Emergency procedures exercise for vessels and barges;
- ♦ Emergency procedures exercise for facilities (optional);
- ♦ Spill management team tabletop exercise; or
- ♦ Equipment deployment exercise.

An unannounced exercise is where the exercise participants do not have prior knowledge of the exercise, as would be the situation in an actual spill incident.

To ensure that the nation maintains an adequate posture for response preparedness, and to satisfy the OPA 90 requirement for unannounced exercises, it is necessary to have an exercise program, which is comprised of both announced and unannounced exercises. The requirement for the annual unannounced exercise is necessary to maintain the level of preparedness necessary to effectively respond to a spill.

Response to an actual spill should be taken as credit for the unannounced exercise requirement, if the response was evaluated.

The emergency procedures exercise is being offered as an option for facilities, to provide an additional exercise that may be conducted unannounced.

Government-Initiated Unannounced Exercises

The government-initiated unannounced exercises are designed to give the agency with primary regulatory oversight over a particular industry the opportunity to evaluate, on a random basis, the response preparedness of that industry. The PREP has attempted to make this requirement as reasonable as possible. The frequency of these drills for the noted Agencies are as follows:

- ◆ For Coast Guard regulated vessels and facilities, the government-initiated unannounced exercises are limited to four per area per year.
- ◆ For EPA-regulated facilities, the government-initiated unannounced exercises are limited to 10% of the plan holders per EPA region per year.
- ◆ For RSPA-regulated pipelines, the government-initiated unannounced exercises are limited to 20 annually across the nation.
- ◆ For MMS-regulated offshore facilities, the number of government-initiated unannounced exercises are determined by the Regional Supervisor and may exceed 50 per year nationally. A facility will not face an MMS unannounced exercise more than once per year, unless the results of previous exercises indicate that follow-up drills are warranted due to poor performance during a drill.

A plan holder directed to participate in a government-initiated unannounced exercise is required to participate as directed unless specific conditions exist that may result in safety hazards. The cost of the unannounced exercise will be borne by the response plan holder.

For complex facilities that are regulated by two or more agencies, it is the responsibility of the exercising agency to notify and invite the participation of the other agency and the responsible On-Scene Coordinator in advance, so as to minimize the possibility of the facility being exercised multiple times during a compressed time period.

A plan holder that has successfully completed a government-initiated unannounced exercise would not be required to participate in another Federal government-initiated unannounced exercise for at least 36 months from the time of the last exercise provided that the drill protocols and method of evaluation are equivalent. The plan holder must maintain documentation of this participation.

Guidelines for determining successful completion of an exercise and for determining enforcement actions (including but not limited to civil penalties) for an unsuccessful exercise are the responsibility of the individual oversight agencies, based on application of their individual agency regulations.

→ **Successful Completion of Government-Initiated Unannounced Exercises.**

A government-initiated unannounced exercise must be successfully completed as determined by the initiating authority. Failure to successfully complete an exercise indicates that either the plan holder could not properly implement its response plan, that the response resources were not available or not in operating condition, or that response personnel were not adequately trained in implementing the response plan. These are all causes for corrective action that may include but is not limited to additional unannounced exercises and revisions to the submitted response plan. For an exercise to be successful it is intuitive that it must meet the Scope and Objectives of the exercise element. It is the responsibility of the agency with oversight of the regulated entity to develop specific guidelines for determining the successful completion of an exercise and for determining appropriate enforcement actions (including but not limited to civil penalties) for an unsuccessful exercise.

One of the objectives for successful completion of an exercise is the concept of demonstrating that the response can be conducted in a timely manner. Note that the connotation of timely remains a planning rather than a performance standard. Timely is **defined** in Section 1 of these guidelines and is further discussed in specific portions of the Guiding Principles and in those sections of the Guidelines which address specific exercise elements for vessels and facilities.

Marine Transportation-Related Facilities and Vessels Regulated by the U.S. Coast Guard.

Coast Guard personnel conducting USCG-initiated unannounced exercises will be guided by the following concepts when determining success of an exercise. Keeping in mind that response time frames in the regulations are planning standards and not performance standards, and that the government initiated unannounced exercise program focuses on average most probable discharges, successful completion cannot be determined by a stopwatch, but by subjective evaluation of a variety of factors including:

1. Response resources located within 17-mile radius of transfer site (boom - 1 hour response time over the road given half hour for mobilization) and 52-mile radius of transfer site (recovery equipment -

2 hour response time over the road given half hour for mobilization) if response personnel are standing by with the equipment during any plan holder transfer operation.

2. For lightering, bunkering etc, on water, Response resources located within 2.5 nautical mile radius of transfer site (boom - 1 hour response time over the road given half hour for mobilization) and 7.5 nautical mile radius of transfer site (recovery equipment - 2 hour response time over the road given half hour for mobilization) if response personnel are standing by with the equipment during any plan holder transfer operation.
3. Personnel to operate the equipment need not be co-located with the equipment, as long as those personnel are located within the same response radii and personnel needed to mobilize and transport the equipment are co-located with the equipment.
4. If plan holder notifies and orders OSRO equipment quickly and the OSRO demonstrates it's capability to mobilize the equipment immediately then the precise time the equipment arrives on scene is not important. USCG exercise personnel may opt to send a team to the OSRO site to observe mobilization as part of the exercise. (E.g., Boom is 7 miles away from transfer site - at 35 miles per hour that boom can be on scene in 12 minutes, so if notification and mobilization can be completed in 45 minutes, it is reasonable to assume that the boom will be on scene in less than one hour. If boom is 17 miles away notification and mobilization must be completed in 30 minutes. If it is 28 miles away, mobilization must be complete in 15 minutes, and so on.).
5. Under the above circumstances it does not matter how soon the equipment and personnel arrive on scene because any delay can reasonably be presumed to have been caused by the instant conditions rather than the average conditions on which the planning travel times are based.
6. Once the equipment is delivered on scene, personnel should be able to deploy and operate the equipment without significant difficulty (people should generally be aware of locations of equipment launch sites, anchoring points and deployment strategies.) However, because specific conditions vary at every site, deployments are not likely to be entirely seamless and deployment personnel may need to make adjustments that will delay completion of deployment. In fact,

the ability to adjust to these differing environmental conditions may be an indicator of the competence of response personnel.

7. While it is intended that equipment be in the water and operational before the end of 4-hour exercise period, there are circumstances, particularly related to safety and non-interference with actual operations that may delay completion of deployment beyond that time. In such a case, exercise should continue until equipment is deployed and operated satisfactorily.

→ **Non-transportation-Related Facilities Regulated by the Environmental Protection Agency.**

The measure of an effective unannounced government-initiated exercise will be the overall ability of the responders identified in the facility response plan to rapidly and effectively control a small discharge with particular attention to those actions that afford the best chances to control a spill and minimize its impact in the first few hours of the incident. While recognizing that an effective response to an oil discharge entails the rapid deployment of proper equipment, it is not the intention of the EPA to use timeliness as the sole factor when evaluating the response to a government-initiated unannounced exercise for a small discharge. EPA personnel will evaluate whether the response equipment specified in the response plan arrives at the specified times. These times are listed in the response plan and are based on the response planning requirements in 40 CFR 112 or alternative response times when approved by the Regional Administrator. Whether the containment boom and recovery devices specified in the response plan arrive precisely at the specified times is less relevant than the overall conduct of the exercise and the successful achievement of the exercise objective described in PREP. The objective of a government-initiated unannounced exercise for a small discharge includes the following sub-objectives:

- ◆ Conducting proper notifications;
- ◆ Arrival of containment boom as specified in the approved response plan within one hour of detection of the discharge and the subsequent successful deployment;
- ◆ Arrival of oil recovery devices as specified in the approved response plan within two hours of detection of the discharge and the subsequent successful operation/simulated recovery;

- ◆ Demonstrating the availability of adequate storage capacity for recovered oil; and
- ◆ Properly conducting the exercise considering the size of a small discharge including skill and competency of responders and material readiness of response equipment.

The failure to achieve any one sub-objective should not automatically indicate that an exercise is a failure. EPA personnel evaluating the exercise should assess: the plan holders ability to conduct proper notifications; material readiness of response equipment; and the overall ability of responding personnel to mobilize, arrive on scene in a timely manner, properly deploy the containment boom, simulate recovery of oil, and demonstrate skill and competency during the 4 hour exercise window.

The EPA exercise evaluator will have a subjective role in determining the success of the exercise based on the achievement of the exercise objectives within the specific time. These evaluations will be dependent on spill site and circumstances. EPA personnel may request to review records of previous facility response plan exercises when there is a concern that the response time is excessive. As the result of an unsuccessful exercise the EPA may require the plan holder to participate in additional unannounced exercises, revise the existing response plan, or both. Unsuccessful unannounced exercises may also result in enforcement action against the plan holder.

→ **Safety During Exercises and Responses.**

The responsibility for safely conducting an exercise or an actual response remains with the plan holder and responding personnel. The response plan should comply with all the regulatory requirements while considering safety factors. Plan holders and responders are never expected to operate in an unsafe or illegal manner during an exercise or actual response. The plan holder is responsible to confirm that the resources identified in the response plan can mount an effective response while operating within all applicable laws and regulations. In short, there is no expectation or justification for placing people at risk during an exercise or response. Conducting the exercise in an unsafe manner is likely to contribute to an unsatisfactory exercise.

Triennial Exercise of the Entire Response Plan.

Every 3 years all components of the entire response plan must be exercised. Rather than requiring each plan holder to conduct a major-exercise every 3

years, the PREP allows for the individual components to be exercised in portions through the required exercises.

The following are the basic types of plan components that must be exercised at least once every 3 years:

Organizational Design

- (1) Notifications
- (2) Staff mobilization
- (3) Ability to operate within the response management system described in the plan

Operational Response

- (4) Discharge control
- (5) Assessment of discharge
- (6) Containment of discharge
- (7) Recovery of spilled material
- (8) Protection of sensitive areas
- (9) Disposal of recovered material and contaminated debris

Response Support

- (10) Communications
- (11) Transportation
- (12) Personnel support
- (13) Equipment maintenance and support
- (14) Procurement
- (15) Documentation

While not all of these components would necessarily be contained in each plan, the plan holder should identify those that are applicable from the list above, and add or delete other components as appropriate. The plan holder would then be responsible for ensuring that all components of the plan are exercised within each 3-year exercise cycle.

To satisfy the requirement of the triennial exercise of the entire response plan, it is not necessary to exercise the entire plan all at one time. The plan may be exercised in segments over a period of 3 years, as long as each component of the plan is exercised at least once within the 3-year period. The required exercises should be developed to ensure that each component is addressed and exercised in the triennial cycle. Appendix A

includes a template for use by plan holders tracking exercise completion over the 3-year PREP cycle.

The plan holder is responsible for documenting the components completed in the exercises.

→ Triennial Cycle.

In the triennial cycle, the following internal exercises must be conducted

- ✧ **12 qualified individual notification exercises;**
- ✧ **12 emergency procedures exercises**--manned vessels and unmanned barges (optional for facilities);
- ✧ **3 spill management team tabletop exercises**--one must involve a worst case discharge scenario;
- ✧ **3 unannounced exercises**--any of the exercises, with the exception of the qualified individual notification exercise, if conducted unannounced, would satisfy this requirement;
- ✧ **Equipment deployment exercises as described below:**
 - ◆ For vessel/facility owned and operated equipment-
 - 6 plan holder owned and operated equipment deployment exercises (for plan holders with vessel/facility owned and operated equipment identified in their response plan)
 - ◆ For vessels and facilities with OSROs identified for response equipment-
 - 3 OSROs equipment deployment exercises
 - ◆ For pipelines -
 - 3 pipeline equipment deployment exercises (using either OSRO and/or operator owned equipment)
 - ◆ For offshore facilities
 - 3 equipment deployment exercises (for equipment staged onshore)

- 6 equipment deployment exercises (for equipment staged offshore); and

- ✧ **Triennial Exercise of Entire Response Plan** - Each component of the response plan must be exercised at least once in the triennial cycle.

Area Exercises

The purpose of the area exercise is to exercise the entire response community in a particular area. An area is defined as that geographic area for which a separate and distinct Area Contingency Plan has been prepared, as described in OPA 90. The response community includes the federal, state and local government and industry. The area exercises are designed to exercise the government and industry interface for spill response.

The goal of the PREP is to conduct 20 area exercises per year nationwide, 60 within a triennial cycle. This method should ensure that all areas of the country are exercised triennially. Six of the 20 annual area exercises would be led by the government, that is the Area Committee, with a single industry plan holder as exercise partner. Industry plan holders would lead the other 14 with the Area Committee as exercise partner. An exercise design team will develop all of the area exercises. The exercise design team is comprised of representatives from the federal, state, and local government agencies, the local response community and the industry plan holder. A lead plan holder would lead each area exercise. The lead plan holder is the organization (government or industry) that is responsible for the primary plan that is exercised in the area exercise. The lead plan holder would have the final word on designing the scope and scenario of the exercise. The U.S. Coast Guard or the EPA, as Area Committee chair, would be the lead plan holder for the 6 government led exercises, with RSPA and MMS participating as appropriate.

A *suggested* mix of participants for the industry led area exercises would include:

- ◆ Vessels (6 exercises);
- ◆ Marine transportation-related (MTR) facilities (2 exercises);
- ◆ Onshore and certain offshore non-transportation-related facilities (2 exercises)
- ◆ Pipelines (2 exercises); and

- ◆ Offshore facilities (2 exercises).

The area exercises do not necessarily have to be large-scale productions. The scenario does not always have to involve a worst-case discharge. However at a minimum, the scenario must involve exercise of Tier I Worst-Case discharge capability. The primary purpose of the area exercise is to activate and observe the response infrastructure in the area, and the ability of the entire response community to effectively conduct a spill response. The focus should be on the interaction between the responsible party and the federal, state and local government to exercise both the Area Contingency Plan and the responsible party's response plan. The following are recommendations for the area exercises:

- ◆ Each exercise should be approximately 8-12 hours in duration. The exercises may be longer, if agreed to by the exercise design team.
- ◆ The area response mechanism would be evaluated in each area exercise. The unified command would be exercised.
- ◆ The lead plan holder will have the primary voice and final decision authority in the exercise design. However, exercise design should be conducted as a cooperative effort of the entire exercise design team.
- ◆ The exercise scenario will involve some amount of equipment deployment. The extent of equipment deployment should be determined by the lead plan holder after consulting with the exercise design team.

Area exercise equipment deployment should include testing adequacy of various response strategies contained in the plan, including but not limited to: protective booming for shoreline, fish, wildlife, and sensitive environment; fast-water, open-water, or shallow water containment and collection; or dispersant or in-situ burn operations. If the exercise spill scenario involves a maximum most probable or larger spill, a minimum of tier 1 equipment deployment should be conducted.

Equipment deployment need not be conducted simultaneously with the tabletop portion of the exercise. It may be done several weeks or even months prior to or after the tabletop to allow more efficient allocation of exercise planning and execution resources.

An Industry plan holder that participates in an Area Exercise would not be required to participate in another area exercise for a minimum of 6 years.

Plan holders are responsible for funding their participation in the area exercises.

An evaluation report should be completed not later than 60 days after completion of the area exercise. The evaluation report is completed by the joint evaluation team. For USCG Area Exercises, results of these joint evaluations will be entered in CGSAILS.

Area Exercise Scheduling

Scheduling of area exercises will be done under a nationally coordinated system that involves the federal, state and local governments and industry plan holders, and that recognizes the unique needs of specific geographic regions of the country.

→ NSCC.

A National Schedule Coordination Committee (NSCC) has been established for scheduling the area exercises. The NSCC is comprised of personnel representing the four federal regulating agencies - the Coast Guard, EPA, RSPA, and MMS.

→ Scheduling Process.

The NSCC is charged with developing and publishing a proposed area exercise schedule for each upcoming triennial period. This proposed schedule will be published in the Federal Register annually. The reason the exercises are scheduled three years in advance is to allow both area committees and industry plan holders to allocate sufficient funds and personnel. The NSCC will solicit comments on the proposed schedule and industry plan holders to lead and participate in the Area Exercises. It is important to note that the NSCC only proposes which area plans will be exercised over the three-year period. It is incumbent on the Regional Response Teams and Area Committees with jurisdiction over an area, to validate the proposed timeframe and to identify the industry plan holder who will participate in the exercise. Each Regional Response Team and Area Committee should work with the local industry to identify industry plan holders three years in advance of the scheduled exercise. Industry plan holders may also provide input to the scheduling process through the Area Committees.

Other Credit Issues

→ Credit for Spill Response.

Plan holders may take credit for internal exercises conducted in response to actual spills. The spill response must be evaluated. The plan holder must determine which exercises were completed in the spill response. This determination should be based on whether the response effort would meet the objectives of the exercise as listed in the PREP guidelines. The plan holder must document the exercises completed.

The NSCC is responsible for authorizing credit for area exercises, based on the recommendations of the On-Scene Coordinator. Credit should be given to a plan holder for participation in an area exercise if the following circumstances exist (1) the response plan was utilized in an actual spill response; (2) the response involved the entire response community; (3) the objectives of the area exercise were met as outlined in the PREP guidelines; (4) the response was evaluated; and (5) the spill response was properly documented and certified. Note that actual spills must involve, at minimum, deployment of worst-case discharge tier 1 capabilities to be eligible for this credit.

→ Proper Documentation for Self-Certification.

Proper documentation for self-certification should include, as a minimum, the following information:

- ◆ The type of exercise.
- ◆ Date and time of the exercise.
- ◆ A description of the exercise.
- ◆ The objectives met in the exercise.
- ◆ The components of the response plan exercised.
- ◆ Lessons learned.

This documentation must be in writing and signed by an individual empowered by the plan holder organization.

Sample documentation forms are attached as Appendix A to the PREP Guidelines.

As a general rule, exercise records should be completed within 30-60 days of the exercise, although this may vary depending on exercise complexity.

Special Issues

→ Complexes.

Complexes are facilities that must meet the requirements of more than one federal agency. For example, a facility that has oil storage tanks, a pipeline and a waterfront oil transfer dock is considered a complex since it must meet the requirements of EPA, RSPA and the Coast Guard.

Complexes would only be required to conduct one exercise to meet all agency requirements for that particular type of exercise. For example, if a quarterly notification exercise is required by all three agencies regulating the complex, one notification exercise per quarter would satisfy the requirements for all three regulatory agencies.

→ Vessels Serving as Secondary Carriers of Oil.

Vessels serving as secondary carriers of oil should comply with the exercise requirements in 33 CFR 155.1045(h).

→ TAPAA Vessels and Facilities.

Trans-Alaska Pipeline Authorization Act (TAPAA) vessels and facilities, in addition to complying with the primary exercise requirements, must comply with the additional exercise requirements identified in the vessel and facility response plan regulations at 33 CFR 155.1125(a)(2) and 33 CFR 154.1125(a)(2), respectively.

→ LEPC Drill Credit.

Local Emergency Planning Committees (LEPCs) are required to conduct hazardous substance exercises periodically. Industry plan holders should coordinate their exercises with the LEPCs, whenever possible, and should take credit, as long as the PREP exercise objectives are met.

→ Foreign Vessels Calling Only Occasionally at U.S. Ports.

If a vessel plan holder has a response plan, prepared with the intent that the vessel would be calling at U.S. ports, even if only occasionally, the vessel plan

holder must have an exercise program in place and be conducting the required exercises. If the plan holder is following the PREP guidelines, all exercises must be conducted at the frequency listed in the PREP guidelines. The only exception to this requirement is the qualified individual notification exercise, which is only required to be conducted quarterly while operating in U.S. waters, otherwise upon entry into U.S. waters.

If a vessel comes into U.S. waters for the first time, but intends to continue trading, it must conduct the qualified individual notification exercise immediately, and then begin its exercise program. Since the PREP follows the calendar year, the triennial cycle should begin as soon as the vessel enters U.S. waters. The vessel should remain on the calendar year schedule, with the following January 1 beginning the next year of the vessel's triennial cycle. In such cases, the plan holder will only be expected to complete 2 full years of internal exercises during the first triennial cycle. For the first year, the plan holder must complete one QI notification and one emergency procedures exercise each quarter during that year. Spill management team and equipment deployment exercises are recommended as soon as possible, but can be held up to 11 months after the date of the first entry into U.S. Waters.

If the vessel only intends to make one voyage into U.S. waters, the vessel must conduct the qualified individual notification exercise immediately upon entry. If the vessel intends to reenter the U.S. at any time, it must comply with all exercise requirements.

→ **Railroad Tank Cars and Motor Vehicle Tank Trucks**

There are few individual railroad tank cars or motor vehicle tank trucks transporting sufficient volumes of oil to be subject to the response planning requirements of OPA 90. For additional information on response planning requirements for individual railroad tank cars and motor vehicle tank trucks transporting oil, including training, equipment testing, and drills, see 49 CFR 130. A railroad tank car or a tank truck which transfers oil to or from certain vessels may be considered to be a mobile marine transportation-related facility and may be subject to the response planning requirements in 33 CFR 154. Loading and offloading of railroad tank cars and tank trucks at certain non-transportation related facilities may be covered by response plans prepared by a facility owner or operator subject to the requirements contained in 40 CFR 112.

Section 3:

U.S. Coast Guard – Regulated Vessels and Marine Transportation-Related Facilities

QI Notification Exercise

Coast Guard Marine Transportation-Related (MTR) Facilities

Applicability:	Facility.
Frequency:	Quarterly.
Initiating Authority:	Company policy.
Particip. Elements:	Facility personnel, qualified individual.
Scope:	Exercise communications between facility personnel and qualified individual.
Objectives:	Contact must be made with a qualified individual or designee, as designated in the response plan.
Certification:	Self-certification.
Verification:	U.S. Coast Guard.
Records:	
Retention:	3 years.
Location:	Records to be kept at the facility.
Evaluation:	Self-Evaluation.
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

For plan holders handling both oil and hazardous substances, a single QI notification will

satisfy exercise requirement for both plans, if both plans rely on the same QI. If the plan holder uses two different QIs, the plan holder is required to exercise each separately,

QI Notification Exercise

Manned Vessels

Applicability:	Manned vessels.
Frequency:	Quarterly while operating in U.S. waters, including the exclusive economic zone (EEZ); otherwise upon entry into U.S. waters, not to exceed four times per year. The qualified individual notification exercise would not be required for ships outside U.S. waters.
Initiating Authority:	Master or designee according to plan.
Particip. Elements:	Vessel personnel, plan designated shore side personnel, and a vessel's qualified individual.
Scope:	Exercise communication between vessel personnel and qualified individual.
Objectives:	Contact by telephone, radio, message-pager or facsimile a confirmation must be made with a qualified individual or designee as designated in the plan. A telex may be used only if the other means are not available
Certification:	Self-certification.
Verification:	U.S. Coast Guard.
Records:	
Retention:	3 years.
Location:	Logbook entry indicating time of qualified individual notification as provided at 33 CFR 155.1060(e)(1).
Evaluation:	Owner or operator should conduct review to determine if objectives have been met.

Self-evaluation.

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated and a proper record is generated.

For plan holders handling both oil and hazardous substances, a single QI notification will satisfy exercise requirement for both plans, if both plans rely on the same QI. If the plan holder uses two different QIs, the plan holder is required to exercise each separately,

QI Notification Exercise

Unmanned Barges

Applicability:

Unmanned barge.

Frequency:

Quarterly while operating in U.S. waters, including the exclusive economic zone; otherwise upon entry into U.S. waters, not required to exceed four times per year. The qualified individual notification exercise would not be required for barges outside U.S. waters.

Initiating Authority:

Barge owner or operator or towing vessel captain.

Particip.. Elements:

Barge custodian and qualified individual.

Scope:

Exercise communication between barge custodian and qualified individual.

Objectives:

Contact-by telephone, radio, message-pager, or facsimile and confirmation must be made with the qualified individual or designee, as designated in the response plan.

Exercises should be conducted randomly to ensure that all barge custodians have an equal chance for participation in the notification exercises.

Certification:

Self-certification.

Verification:

U.S. Coast Guard.

Records:

Retention:

3 years.

Location:

Records to be kept on board the barge or with the response plan for the barge.

Evaluation:

Self-evaluation.

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

For plan holders handling both oil and hazardous substances, a single QI notification will satisfy exercise requirement for both plans, if both plans rely on the same QI. If the plan holder uses two different QIs, the plan holder is required to exercise each separately,

On Board Emergency Procedures Exercise**Manned Vessels**

Applicability:	Manned vessels.
Frequency:	Quarterly.
Initiating Authority:	Master or designee according to plan.
Particip. Elements:	Vessel personnel.
Scope:	Exercise the emergency procedures for the vessel crew to mitigate or prevent any discharge or a substantial threat of such discharge of oil/HAZSUB resulting from shipboard operational activities associated with internal or external cargo transfers.
Objectives:	<p>Conduct an exercise of the vessel's emergency procedures to ensure crew knowledge of actions to be taken to mitigate a spill. This exercise may be a walk-through of the crews' actions.</p> <p>Exercise should involve one or more of the sections of the emergency procedures for spill mitigation. For example -</p> <ul style="list-style-type: none">> Simulation of response to a collision.> Simulation of response to an oil spill on the deck of the vessel.> Simulation of response to a vessel fire. <p>Annually ensure that spill mitigation procedures for all contingencies identified in the response plan have been exercised.</p>
Certification:	Self-certification.
Verification:	U.S. Coast Guard.

Records:

Retention: 3 years.

Location: Logbook entry as provided at 33 CFR 155.1060(e)(1).

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

On vessels covered by both oil and hazardous substance plans, separate oil and hazardous substance exercises are not required. However, the shipboard personnel should alternate oil and hazardous substance scenarios each quarter.

Emergency Procedures Exercises**Unmanned Barges**

Applicability: Unmanned barge(s).

Frequency: Quarterly.

Initiating Authority: Barge owner or operator.

Particip. Elements: Barge custodian.

Scope: Exercise the emergency procedures to be taken for an oil/HAZSUB discharge or substantial threat of such discharge. Such procedures are outlined at 33 CFR 155.1040 (a).

Objectives: Conduct a walk-through of the emergency procedures.

Ensure barge custodians know proper actions to take in the event of an oil discharge or substantial threat of such discharge.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: Records to be kept on board the barge or with the response plan for the barge.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit

should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

On vessels covered by both oil and hazardous substance plans, separate oil and hazardous substance exercises are not required. However, the shipboard personnel should alternate oil and hazardous substance scenarios each quarter.

Emergency Procedures Exercises

Facilities (Optional)*

Applicability:	Facility.
Frequency:	Quarterly.
Initiating Authority:	Facility owner or operator.
Particip. Elements:	Facility personnel.
Scope:	Exercise the emergency procedures for the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil/HAZSUB resulting from facility operational activities associated with oil transfers.
Objectives:	<p>Conduct an exercise of the facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate a spill. This exercise may be a walk-through of the emergency procedures.</p> <p>Exercise should involve one or more of the sections of the emergency procedures for spill mitigation. For example, the exercise should involve a simulation of a response to an oil spill.</p> <p>The facility should ensure that spill mitigation procedures for all contingencies at the facility are addressed at some time.</p>
Certification:	Self-certification.
Verification:	U.S. Coast Guard.
Records:	
Retention:	3 years.

Location: At each facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in-conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

***This section describes an optional exercise to provide facilities with an exercise that may be conducted unannounced to fulfill the internal unannounced exercise requirement.**

At facilities covered by both oil and hazardous substance plans, separate oil and hazardous substance exercises are not required. However, the shipboard personnel should alternate oil and hazardous substance scenarios each quarter.

Spill Management Team Tabletop Exercise

U.S. Coast Guard MTR Facilities

Applicability: Facility spill management team

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Spill management team as established in the response plan.

Scope: Exercise the spill management team's organization, communication, and decision-making in managing a spill response.

Objectives:

Exercise the spill management team in a review of -

- > Knowledge of the response plan;
- > Proper notifications;
- > Communications system;
- > Ability to access an OSRO/HSRO;
- > Coordination of internal organization personnel with responsibility for spill response;
- > An annual review of the transition from a local team to a regional, national, and international team, as appropriate;
- > Ability to effectively coordinate spill response activity with the National Response System (NRS) infrastructure. (If personnel from the NRS are not participating in the exercise, the spill management team should demonstrate knowledge of response coordination with the NRS);

- > Ability to access information in the Area Contingency Plan for location of sensitive areas, resources available within the area, unique conditions of area, etc
- > At least one spill management team tabletop exercise in a triennial cycle would involve simulation of a worst-case discharge scenario.

Certification: Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: At each facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Plan holders are responsible for ensuring that SMTs are familiar with Area Committees/Regional Response Teams (*RRTs) and Area Contingency Plans in every area in which the plan holder operates. While it is not practicable to require an SMT to exercise in every area/region in which they offer cover each year, each SMT is expected to review ACPs annually and the make-up of Area Committees/RRTs in all areas in which they offer coverage. Self-certification for exercise credit should include SMT certification that the SMT has completed annual review and is familiar with the ACPs and Area

Spill Management Team Tabletop Exercise

Vessels

Applicability:	Vessel spill management team.
Frequency:	Annually.
Initiating Authority:	Company policy.
Particle Elements:	Spill management team as established in the response plan.
Scope:	Exercise the spill management team's organization, communication, and decision-making in managing a spill response.
Objectives:	<p>Exercise the spill management team in a review of -</p> <ul style="list-style-type: none">> Knowledge of the response plan;> Proper notifications;> Communications system> Ability to access an OSRO/HSRO;> Coordination of internal organization personnel with responsibility for spill response;> An annual review of the transition from a local team to a regional, national, and international team, as appropriate;> Ability to effectively coordinate spill response activity with the National Response System (NRS) infrastructure. (If personnel from the NRS are not participating in the exercise, the spill management team should demonstrate knowledge of response coordination with the NRS.); and> Ability to access information in the Area

Contingency Plan for location of sensitive areas, resources available within the Area, unique conditions of Area, etc.

At least one Spill Management Team Tabletop Exercise in a triennial cycle would involve simulation of a worst-case discharge scenario.

Certification:	Self-certification.
Verification:	U.S. Coast Guard.
Records:	
Retention:	3 years.
Location:	In accordance with 33 CFR 155.1060(e) (2).
Evaluation:	Self-evaluation.
Credit:	<p>Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.</p> <p>Plan holders are responsible for ensuring that SMTs are familiar with Area Committees and Area Contingency Plans in every area in which the plan holder operates. While it is not practicable to require an SMT to exercise in every area in which they offer cover each year, each SMT is expected to review ACPs annually and the make-up of Area Committees in all areas in which they offer coverage. Self-certification for exercise credit should include SMT certification that the SMT has completed annual review and is familiar with the ACPs and Area Committees in all areas in which the plan holder operates.</p>

For plan holders who handle both oil and hazardous substances, if the same spill management team handles all oil and hazardous substance incidents, only one SMT exercise is required annually. In such cases, at least 1 of the exercises should focus on oil and 1 on hazardous substances every three years. Over the course of six years, at least one worst-case hazardous substance and one worst-case oil scenario should be exercised.

For plan holders who handle both oil and hazardous substances, if the spill management teams are not the same, separate spill management team exercises are required.

Equipment Deployment Exercises

U.S. Coast Guard MTR Facilities

Applicability:	Facilities with <u>facility owned and operated response equipment</u> .
Frequency:	Semiannually.
Initiating Authority:	Company policy.
Particip. Elements:	Facility personnel.
Scope:	<p>Deploy and operate facility owned and operated response equipment identified in the response plan. The equipment to be deployed would be either (1) the minimum amount of equipment for deployment as described in "Guiding Principles", or (2) the equipment necessary to respond to an average most probable discharge at the facility, <u>whichever is less</u>.</p> <p>All of the facility's personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the facility's equipment must be included in a comprehensive maintenance program. Credit should be taken for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.</p>
Objectives:	<p>Demonstrate ability of facility personnel to deploy and operate equipment.</p> <p>Ensure equipment is in proper working order. deployment should also include testing ACP containment, protection and diversion strategies.</p>
Certification:	Self-certification.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Location: Records to be kept at facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Note: If a facility with facility owned and operated equipment also identifies OSRO equipment in its response plan, the OSRO equipment must also be deployed and operated in accordance with the equipment deployment requirements for OSRO owned equipment.

Equipment Deployment Exercises

U.S. Coast Guard MTR Facilities

Applicability: Facilities with OSRO/HSRO response equipment cited in their response plan.

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Facility owner or operator and OSRO/HSRO.

Scope: Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment as described in "Guiding Principles.

All of the OSRO/HSRO personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the OSRO/HSRO equipment must be included in a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturers recommendations and best commercial practices. The facility owner or operator must ensure that inspection and maintenance by the OSRO/HSRO is documented. The OSRO/HSRO must provide inspection and maintenance information to the owner or operator.

Plan holders must ensure that when a regional OSRO/HSRO is identified in the response plan, the OSRO/HSRO conducts annual equipment deployment exercises in each operating environment for each CG Contingency Planning Area.

Objectives: Demonstrate the ability of the personnel to

deploy and operate equipment.

Ensure the response equipment is in proper working order.

Whenever feasible, equipment deployment should also include testing ACP containment, protection and diversion strategies.

Certification: The facility owner or operator should ensure that the OSRO/HSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.

Verification: U.S. Coast Guard.

Records:

Retention: 3 years.

Records to be kept at the facility.

Evaluation: Self-evaluation.

Credits: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

Equipment Deployment Exercises

Vessels

Applicability: Vessels.

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Vessel owner or operator, and OSRO/HSRO.

Scope: Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment for deployment as described in "Guiding Principles."

All of the OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the OSRO/HSRO equipment must be included in a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. The vessel owner or operator must ensure that inspection and maintenance by the OSRO/HSRO is documented. The OSRO/HSRO must provide inspection and maintenance information to the vessel owner or operator.

Plan holders must ensure that when a regional OSRO is identified in the response plan, the OSRO conducts annual equipment deployment exercises in each operating environment for each CG Contingency Planning Area.

Objective: Demonstrate the ability of the personnel to deploy and operate response equipment.

Ensure the response equipment is in proper working order.

Whenever feasible, equipment deployment should also include testing ACP containment, protection and diversion strategies.

- Certification:** The vessel owner or operator should ensure that the OSRO/HSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.
- Verification:** U.S. Coast Guard.
- Records:**
- Retention:** 3 years (see 33 CFR 155.1060 (e)(2)).
- Evaluation:** Self-evaluation.
- Credit:** Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

Government-Initiated Unannounced Exercises

Vessels and MTR Facility Response Plan Holders

- Applicability:** Vessel and MTR facility response plan holders within the area.
- Frequency:** Triennially, if successfully completed. A facility deemed by the CG/EPA not to have successfully completed the exercise may be required to participate in another government initiated unannounced exercise at the discretion of the exercising agency. (Plan holders who have successfully completed a PREP government-initiated unannounced exercise will not be required to participate in another one for at least 36 months from the date of the exercise.)
- Initiating Authority:** U.S. Coast Guard.
- Particip. Elements:** Vessel and MTR facility response plan holders.
- Scope:** Unannounced exercises are limited to a maximum of four exercises per area per year.
- Exercises are limited to approximately 4 hours in duration.
- Exercises must involve response to an average most probable discharge scenario.
- RSPA and MMS would cover unannounced exercises for pipelines and offshore facilities not a part of a complex in their exercise programs.
- Objectives:** Conduct proper notifications to respond to unannounced scenario of an average most probable discharge.
- Demonstrate response is -
- > Timely- As a general rule, the regulatory planning standard is containment equipment (e.g., booms)

on scene within one hour of notification and recovery equipment (skimmers and temporary storage) on scene within two hours. Therefore in an government initiated unannounced exercise, plan holder should be able to initiate simulated clean up within approximately two hours of exercise commencement.

- > Conducted with adequate amount of equipment for scenario; and
- > Properly conducted.

Whenever feasible, equipment deployment should also include testing ACP containment, protection and diversion strategies.

Certification: U.S. Coast Guard.

Verification: U.S. Coast Guard.

Records:

Retention 3 years.

For facilities, at the facility.
For vessels, in accordance with 33 CFR 155.1060(e)(2).

Evaluation: Evaluation to be conducted by initiating agency.

Credit: Credit may be granted by the initiating authority for an actual spill response when the PREP objectives are met, the response is evaluated by the initiating authority and a proper record is generated. Plan holders participating in this exercise may take credit for notification and equipment deployment exercises, if criteria for those exercises are met, the response is evaluated by the plan holder and a proper record is generated.

Section 4

EPA-Regulated Onshore And Certain Offshore Non Transportation-Related Facilities

PREP Guidelines do not create binding legal requirements.

While the PREP Guidelines have been developed with the regulated community, they cannot be considered to be legally binding substantive rules. Plan holders can accept the PREP Guidelines to fulfill the exercise requirements of the Oil Pollution Act of 1990. An alternative program can also be acceptable subject to approval by the Regional Administrator. (See 40 CFR 112.21) Either the PREP Guidelines or the EPA-approved exercise program developed by the plan holder become binding when referenced in the submitted response plan.

QI Notification Exercises

EPA-Regulated Facilities

Applicability:	Facility.
Frequency:	Quarterly.
Initiating Authority:	Company policy.
Particip. Elements:	Facility personnel and qualified individual.
Scope:	Exercise communications between facility personnel and qualified individual.
Objectives:	Contact must be made with a qualified individual or designee, as designated in the response plan.
Certification:	Self-certification.
Verification:	Environmental Protection Agency (EPA)
Records:	
Retention:	5 years.
Location:	Records to be kept at the facility.
Evaluation:	Self-evaluation.
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Emergency Procedures Exercises

Facilities (Optional)*

Applicability:	Facility.
Frequency:	Quarterly.
Initiating Authority:	Facility owner or operator.
Particip. Elements:	Facility personnel.
Scope:	Exercise the emergency procedures for the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil resulting from facility operational activities associated with oil transfers.
Objectives:	<p>Conduct an exercise of the facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate a spill. This exercise may be a walk-through of the emergency procedures.</p> <p>Exercise should involve one or more of the sections of the emergency procedures for, spill mitigation. For example, the exercise may involve a simulation of a response to an oil spill.</p> <p>The facility should ensure that spill mitigation procedures for all contingencies at the facility are addressed at some time.</p>
Certification:	Self-certification.
Verification:	EPA.
Records:	
Retention:	5 years.
Location:	At each facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

***This is offered as an optional exercise to provide facilities with an exercise that may be conducted unannounced to fulfill the internal unannounced exercise requirement.**

Spill Management Team Tabletop Exercise

EPA-Regulated Facilities

Applicability: Facility spill management team.

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Spill management team as established in the response plan.

Scope: Exercise the spill management team's organization, communication, and decision-making in managing a spill response.

Objectives: Exercise the spill management team in a review of-

- > Knowledge of the response plan;
- > Proper notifications;
- > Communications system;
- > Ability to access an OSRO;
- > Coordination of internal organization personnel with responsibility for spill response;
- > An annual review of the transition from a local team to a regional, national, and international team, as appropriate;
- > Ability to effectively coordinate spill response activity with the National Response System (NRS) infrastructure. (If personnel from the NRS are not participating in the exercise, the spill management team should demonstrate knowledge of response coordination with the NRS.)
- > Ability to access information in Area Contingency

Plan for location of sensitive areas, resources available within the area, unique conditions of area, etc.

At least one spill management team tabletop exercise in a triennial cycle would involve simulation of a worst-case discharge scenario.

Certification: Self-certification.

Verification: EPA.

Records:

Retention: 5 years.

Location: At each facility.

Evaluation: Self-evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Equipment Deployment Exercises

EPA-Regulated Facilities

Applicability: Facilities with facility owned and operated response equipment.

Frequency: Semiannually.

Initiating Authority: Company policy.

Particip. Elements: Facility personnel.

Scope: Deploy and operate facility owned and operated response equipment identified in the response plan. The equipment to be deployed would be either (1) the minimum amount of equipment for deployment as described in "Guiding Principles", or (2) the equipment necessary to respond to a small discharge at the facility, whichever is less.

All of the facility personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the facility equipment must be included in a comprehensive maintenance program. Credit should be taken for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturers recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.

Objectives: Demonstrate ability of facility personnel to deploy and operate equipment.

Ensure equipment is in proper working order.

Certification: Self-certification.

Verification: EPA.

Records:

Retention: 5 years.

Location: Records to be kept at the facility.

Evaluation Self-Evaluation.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Note: If a facility with facility owned and operated equipment also identifies OSRO equipment in its response plan, the OSRO equipment must also be deployed and operated in accordance with the equipment deployment requirements for OSRO owned equipment.

Equipment Deployment Exercises**EPA-Regulated Facilities**

Applicability: Facilities with OSRO response equipment cited in their response plan.

Frequency: Annually.

Initiating Authority: Company policy.

Particip. Elements: Facility owner or operator and OSRO.

Scope: Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment for deployment as described in "Guiding Principles."

All of the OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program. All of the OSRO equipment must be included in a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. The facility owner or operator must ensure that inspection and maintenance by the OSRO is documented. The OSRO must provide inspection and maintenance information to the owner or operator.

Plan holders must ensure that when a regional OSRO is identified in the response plan, the OSRO conducts annual equipment deployment exercises in each operating environment for each CG or EPA Contingency Planning Area, or EPA sub-area

(where identified).

Objectives:	Demonstrate the ability of the personnel to deploy and operate response equipment. Ensure the response equipment is in proper working order.
Certification:	The facility owner or operator should ensure that the OSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.
Verification:	EPA.
Records:	
Retention	5 years, kept at the facility.
Evaluation:	Self-evaluation.
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

Government-Initiated Unannounced Exercises

EPA—Regulated Facility Response Plan Holders

Applicability:	EPA-regulated facility response plan holders within the region.
Frequency:	Triennially, if successfully completed. A facility deemed by the CG/EPA not to have successfully completed the exercise may be required to participate in another government initiated unannounced exercise at the discretion of the exercising agency. (Plan holders who have successfully completed a PREP government-initiated unannounced exercise will not be required to participate in another one for at least 36 months from the date of the exercise).
Initiating Authority:	EPA.
Particip. Elements:	EPA-regulated facility response plan holders.
Scope:	<p>Unannounced exercises are limited to a maximum of 10% of response plan holders per EPA Region per year.</p> <p>Exercises are limited to approximately 4 hours in duration.</p> <p>Exercises should involve response to a small discharge scenario (assume 2,100 gallons outside secondary containment and discharged into or on navigable waters and adjoining shorelines).</p> <p>Exercise would involve deployment of response equipment identified in the facility response plan to respond to spill scenario.</p> <p>RSPA and MMS will cover unannounced exercises for pipelines and offshore facilities <u>not</u></p>

a part of a complex in their exercise programs.

Objectives:

Conduct proper notifications to respond to unannounced scenario of a small discharge.

Demonstrate that the response is -

- > Timely as defined in section 1 of these Guidelines;
- > Conducted with adequate amount of equipment for scenario; and
- > Properly conducted.

Certification:

EPA.

Verification:

EPA.

Records:

Retention:

5 years, kept at the facility.

Evaluation:

Evaluation to be conducted by initiating agency.

Credit:

Credit may be granted by the initiating authority for an actual spill response when the PREP objectives are met, the response is evaluated by the initiating authority and a proper record is generated. Plan holders participating in this exercise may take credit for notification and equipment deployment exercises, if criteria for those exercises are met, the response is evaluated by the plan holder and a proper record is generated.

Section 5

Onshore Transportation-Related Pipelines

Owner or Operator Internal Notification Exercises

Onshore Transportation-Related Pipelines

Applicability:	Pipeline owner or operator.
Frequency:	As indicated by the response plan and, at a minimum, consistent with the triennial cycle (quarterly).
Party Initiating Exercise:	As indicated in response plan.
Participants:	Facility response personnel and the facility's qualified individual.
Scope:	Exercise notification process between key facility personnel and the qualified individual to demonstrate the accessibility of the qualified individual.
Objectives:	Contact by telephone, radio, message-pager, or facsimile and confirmation established as indicated in response plan.
Format:	As indicated in response plan.
Certification:	Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.
Verification:	Verification conducted by Research and Special Programs Administration (RSPA) during regular inspections* or RSPA tabletop exercises.

* Verification will not be done by inspections in the near term.

Records:

Retention: 3 years.

Location: Owner or operator shall retain records as indicated in response plan.

RSPA to retain verification records.

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Internal Tabletop Exercises

Onshore Transportation-Related Pipelines

Applicability:	Pipeline owner or operator.
Frequency:	As indicated by the response plan and, at a minimum consistent with the triennial cycle (annually).
Party Initiating Exercise:	As indicated in response plan.
Participants:	Designated spill emergency response team members.
Scope:	Demonstration of the response team's ability to organize, communicate, and make strategic decisions regarding population and environmental protection during a spill event.
Objectives:	<p>Designated emergency response team members should demonstrate -</p> <ul style="list-style-type: none">> Knowledge of facility response plan;> Ability to organize team members to effectively interface with a unified command;> Communication capability; and> Coordination for response capability as outlined in response plan.
Format:	Internal tabletop exercise as outlined in response plan.
Certification:	Self-certification as indicated in response plan or as defined in the "Guiding Principles" section of this document, whichever is more stringent. Each plan should have a written description of the company's certification process.
Verification:	Verification conducted by RSPA during regular

inspections* or RSPA tabletop exercises.

*** Verification will not be done by inspections in the near term.**

Records:

Retention:	3 years.
Location:	Owner or operator shall retain records as indicated in response plan.
	RSPA to retain verification records.

Credits:

Plan holders should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Owner/Operator Equipment Deployment Exercises

Onshore Transportation-Related Pipelines

Applicability: Pipeline owner or operator.

Frequency: As indicated by the response plan and, at a minimum, as consistent with the triennial cycle (annually).

***The number of equipment deployment exercises should be such that equipment and personnel assigned to each response zone are exercised at least once per year. If the same personnel and equipment respond to multiple zones, they need only exercise once per year. If different personnel and equipment respond to various response zones, each must participate in an annual equipment deployment exercise.**

Party Initiating Exercises: As indicated in response plan.

Participants: Designated spill emergency response team members.

Scope: Demonstrate ability to deploy spill response equipment* Identified in the FRP.

***May consist entirely of operator owned equipment, or a combination of OSRO and operator equipment.**

Objectives: Designated emergency response personnel should demonstrate---

- > (1) Ability to organize; and
- > (2) Ability to deploy and operate representative types of key response equipment as described in response plan.

Format: Announced deployment exercise indicated in response plan.

Certification: Self-certification as indicated in response plan. Each plan should have a written description of the

company's certification process.

Verification: Verification conducted by RSPA during regular inspections* or RSPA tabletop exercises.

***Verification will not be done by inspection in the near term.**

Records:

Retention: 3 years.

Location: Owner or Operator shall retain records as indicated in response plan.

RSPA to retain verification records.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Unannounced Exercises

Onshore Transportation-Related Pipelines

Applicability:	Pipeline owner/operator.
Frequency:	Maximum of 20 unannounced RSPA exercises conducted annually for the pipeline industry as a whole. A single owner or operator will not be required to participate in a RSPA- initiated unannounced exercise, if they have already participated in one within the previous 36 months.
Party Initiating Exercise:	RSPA.
Participants:	Designated spill emergency response team members. Operations staff. On-Scene Coordinator (optional). State and local government (optional).
Scope:	Demonstrate ability to respond to a worst-case discharge spill event.
Objectives:	Designated emergency response team members should demonstrate adequate knowledge of their facility response plan and the ability to organize, communicate, coordinate, and respond in accordance with that plan.
Format:	Unannounced tabletop exercise to discuss strategic issues. Operations will provide the owner or operator the following information at least 10 working days in advance (1) date, time, and location of exercise; (2) expected exercise duration; and (3) response zone to be exercised.

On the day of the exercise, the pipeline owner or operator will be provided the scenario and post-spill events. This information will be used to explore and discuss strategic issues that will help operators evaluate their response plans.

Certification:	Certification can be effectuated by RSPA personnel conducting the exercise. RSPA will provide written certification of the exercise date, participants, and response zone exercised.
Verification:	Verification can be made by RSPA personnel conducting the exercise.
Records:	
Retention Time:	3 years.
Location:	Owner or Operator shall retain records as indicated in response plan. RSPA to retain verification records.
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Section 6

Offshore Facilities

Notification Exercises

Offshore Facilities

these objectives are met, the response is evaluated, and a proper record is generated.

Applicability:	Offshore facilities.
Frequency:	Annual.
Initiating Authority:	Owner or operator.
Participating Elements:	Facility personnel and qualified individual.
Scope:	Exercise and test communications between personnel on each facility manned on a 24-hour basis and qualified individual; information to be provided in the event of a spill must be simulated during this exercise.
Objectives:	Voice contact must be made with the qualified individual.
Certification:	Self-certification.
Verification:	Verification by MMS inspection personnel during site visits.
Records:	
Retention:	3 years.
Location:	Records to be maintained at the facility or at a corporate location designated in the spill response plan.
Evaluation:	Self-evaluation.
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when

UNANNOUNCED EXERCISES

Offshore Facilities

Applicability:	Offshore Facilities.
Frequency:	Frequency will be determined by the Regional Supervisor. A facility will not face an agency unannounced exercise more than once per year, unless the results of previous exercises warrant more frequency.
Initiating Authority:	MMS.
Participating Elements:	Facility personnel, qualified individual, spill management team, oil spill removal organization (OSRO), state and local government and other federal agencies (optional).
Scope:	Exercise will require that the owner or operator respond to a spill scenario posed by the MMS Regional Supervisor.
Objectives:	<p>Conduct proper notifications to respond to unannounced scenario.</p> <p>Demonstrate ability to mobilize adequate equipment to respond to scenario.</p> <p>Demonstrate ability to conduct timely deployment of equipment.</p> <p>Demonstrate ability to conduct proper deployment to respond to scenario.</p>
Certification:	MMS.
Verification:	Verification by MMS personnel.
Records:	
Retention:	3 years.

Location: MMS will maintain records at the MMS Regional Office. The owner or operator will maintain records at a corporate location identified in the approved spill response plan.

Evaluation: Evaluation to be conducted by MMS.

Credits Plan holder may receive credit for other required exercises if the unannounced exercise is successfully completed, objectives of the other exercise(s) are met, and a proper record is generated.

Spill Management Team Tabletop Exercise

Offshore Facilities

Applicability:	Spill management team.
Frequency:	Annually.
Initiating Authority:	Owner or operator.
Participating Elements:	Spill management team as established in response plan.
Scope:	Exercise the spill management team annually.
Objectives:	<p>Exercise the spill management team's organization, communication, and decision-making in managing a spill response to an unannounced scenario.</p> <p>Exercise the spill management team in a review of-</p> <ul style="list-style-type: none"> > Knowledge of response plan; > Proper notifications; > Communications system; > Ability to access an OSRO; > Coordination of OSRO containment and recovery activity; > Coordination of organization or agency personnel with responsibility for spill response; > Ability to effectively coordinate spill response activity with National Response System infrastructure; and > Ability to access information in Area Contingency Plan for location of sensitive

areas, resources available within the area, unique conditions of area, etc.

Certification:	Self-certification.
Verification:	Verification by MMS personnel.
Records:	
Retention:	3 years.
Location:	Records to be maintained at a corporate location designated in the spill response plan.
Evaluation:	Self-evaluation. The MMS may evaluate if the exercise is witnessed.
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Equipment Deployment Exercises

Offshore Facilities-Equipment Staged Offshore

Applicability:	OSRO or owner or operator response equipment required to be staged offshore.
Frequency:	Semiannually.
Initiating Authority:	OSRO, or owner or operator.
Participating Elements:	Facility or OSRO personnel.
Scope:	Deploy and operate response equipment that is required to be staged offshore and identified in the response plan. Each <u>type</u> of this equipment is to be deployed annually. Each type need not be deployed at each exercise. Credit will be given for any government-initiated deployment exercise or exercises initiated by OSRO member companies.*
Objectives:	Demonstrate ability of spill response personnel to deploy and operate equipment. Evaluate deployment strategies under various spill scenarios.
Certification:	Self-certification (OSRO for OSRO equipment and owner or operator for owner or operator equipment).
Verification:	Verification by MMS inspection personnel.
Records:	
Retention:	3 years.
Location:	Records to be kept at the OSRO or at the facility or a corporate location designated in approved response plan for owner or operator equipment.

Evaluation: Self-evaluation. The MMS may evaluate if the exercise is witnessed.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

***For exploratory wells being drilled from Mobile Offshore Drilling Units (MODUs), at least one deployment exercise will be conducted during drilling of each well, as directed by the Regional Supervisor, if staged response equipment is required by the Regional Supervisor.**

Equipment Deployment Exercises

Offshore Facilities – Equipment Staged Onshore

Applicability:	OSRO, or owner or operator response equipment stored at an onshore location.
Frequency:	Annually.
Initiating Authority:	OSRO, or owner or operator.
Participating Elements:	OSRO, or owner or operator personnel.
Scope:	Deploy and operate response equipment that is stored onshore and identified in the response plan. Each type of equipment must be exercised during each triennial period. It is not necessary to deploy each piece of equipment.
Objectives:	Demonstrate ability of spill response personnel to deploy and operate equipment. Evaluate deployment strategies under various spill scenarios.
Certification:	Self-certification (OSRO for OSRO equipment and owner or operator for owner or operator equipment).
Verification:	Verification by MMS inspection personnel.
Records:	
Retention:	3 years.
Location:	Records to be kept at the OSRO or at the facility or a corporate location designated in approved response plan for owner or operator equipment.
Evaluation:	Self-evaluation. The MMS may evaluate if the

exercise is witnessed.

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Section 7

Area Exercises

Notification Exercise

Area

Applicability:	Area.
Frequency:	Quarterly.
Initiating Authority:	On-Scene Coordinator.
Participating Elements:	Key Elements of the unified command (appropriate federal, state and local government agencies).
Scope:	Exercise and test communication between On-Scene Coordinator and key elements of the unified command.
Objectives:	<p>Ensure that the key elements of the unified command know whom to call in the event of a discharge within the area.</p> <p>Ensure contact by telephone, radio, message-pager, or facsimile and confirmation is made between the On-Scene Coordinator and key elements of the unified command.</p>
Certification:	Self-certification.
Verification:	Verification to be conducted by the District or Region.
Records:	
Retention:	3 years (USCG). 5 years (EPA).
Location:	With the On-Scene Coordinator.
Evaluation:	By Area Committee.

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all exercise objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Spill management Team Tabletop Exercise**Area**

Applicability:	Area spill management team.
Frequency:	Annually.
Initiating Authority:	U.S. Coast Guard District (m) or EPA Region.
Participating Elements:	Spill management team for the area (U.S. Coast Guard or EPA and respective response team) and state(s).
Scope:	Exercise the spill management team's organization, communication, and decision-making in managing a spill response.
Objectives:	<p>Exercise the spill management team in a review of</p> <ul style="list-style-type: none">> Knowledge of the Area Contingency Plan;> Proper notifications;> Communications system> Ability to access response equipment> Coordination of organization or agency personnel with responsibility for spill response;> Ability to effectively coordinate spill response activity with National Response System infrastructure;> Ability to access information in Area Contingency Plan for location of sensitive areas, resources available within the area, unique conditions of the area, etc.; and <p>Exercise the response management system identified in the ACP and to the extent possible the unified command.</p>

Equipment Deployment Exercises

	At least one spill management team tabletop exercise in a triennial cycle would involve simulation of a <u>worst-case discharge</u> scenario.
Certification:	Self- Certification.
Verification:	Verification to be conducted by District or Region.
Records	
Retention	3 years (USCG). 5 years (EPA).
Location:	With On-Scene Coordinator.
Evaluation:	Self-evaluation.
Credit:	Credit should be taken for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

	Area
Applicability:	Area Committee.
Frequency:	Annually.
Initiating Authority:	On-Scene Coordinator.
Participating Elements:	Local area response community (appropriate federal, state and local response agencies).
Scope:	Deploy and operate Coast Guard and EPA "first aid" response equipment and the Coast Guard's prepositioned equipment. All of the "first aid" equipment or that which is necessary to respond to an average most probable discharge in the Area, <u>whichever is less</u> , should be deployed annually. All response personnel must be included in a comprehensive training program, and all response equipment in a comprehensive maintenance program. Credit should be taken for deployment of equipment during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices.
Objectives:	Demonstrate the ability of the response personnel to deploy and operate the equipment. Ensure that the response equipment is in proper working order.
Certification:	Self-certification.
Verification:	District or Region.
Records:	

Retention: 3 years (USCG).

5 years (EPA).

With On-Scene Coordinator.

Evaluation: Self-evaluation.

Credits: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Area Exercises

Area

Applicability: Area Response community.

Frequency: Triennially for each area.

Initiating Authority: U.S. Coast Guard, EPA and Industry.

Participating Elements: Appropriate Federal, state, and local government, and industry and other members of the response community.

Scope: Area exercises will exercise the Area Response Community.

Objectives: Exercise the Area Contingency Plan, along with selected industry response plans.

Exercise the response management system identified in the ACP and, to the extent possible, the unified command with the appropriate participants.

Exercise the area and industry spill management teams.

Deploy adequate response equipment for the exercise scenario. At a minimum, the scenario must involve exercise of Tier I Worst Case discharge capability.

Format: Total annual exercises would consist of the following-

- > 6 government-led exercises; and
- > 14 industry-led.

Total = 20 Area Exercises Per Year.

Area exercises should be *approximately* 8 - 12

hours in duration.

Exercise scenario to be developed by the exercise design team.

To simulate realism, the exercise should be conducted in the command post that would be utilized for a spill response, whenever possible.

Exercise may be in real or limited compressed time, and may start at any point during an incident, as determined by the Exercise Design Team. Flexibility should be allowed, to ensure the exercise objectives are met.

Lessons learned from the exercise should be incorporated into the PREP Lessons Learned System (e.g., CGSAILS), whenever possible.

Certification:

The On-Scene Coordinator will certify completion of the area exercise. In certifying the area exercise, the On-Scene Coordinator will consider the following-

- > The area exercise was conducted.
- > The area exercise met the objectives outlined in the PREP guidelines.
- > The area response community was exercised for spill response preparedness.

Industry plan holders should take credit for all of the exercises completed during the area exercise. These exercises shall be self-certified by the plan holder.

Verification:

Verification to be done by the National Scheduling Coordinating Committee.

Records

Retention:

3 years (USCG).

5 years (EPA).

Location:

On Scene Coordinator.

Evaluation:

Joint evaluation team to be comprised of the federal government (U.S. Coast Guard, EPA, RSPA or MMS) state and industry.

Scheduling:

Scheduling of area exercises will be done by the NSCC, utilizing input from the On-Scene Coordinator, Area Committee and Regional Response Team, in consultation with the industry. A 3-year schedule of PREP Area exercises will be published in the federal register as a public forum for government and industry input to the scheduling process.

Appendix A: Internal Exercise Documentation Forms

The following sample documentation forms are provided to give plan holders an idea of how to document the internal PREP exercises. These sample forms, are provided only as guidance. Plan holders do not have to include all of the information presented on these forms nor do they have to use these exact forms. Plan holders may choose to develop their own forms. Documentation should be completed within 60 days of exercise completion. Documentation should include, as a minimum, the following information:

- ◆ The type of exercise;
- ◆ Date and time of the exercise;
- ◆ A description of the exercise;
- ◆ The objectives met in the exercise;
- ◆ The components of the response plan exercised; and
- ◆ Lessons learned along with procedures and schedules for implementing lessons learned.

Internal Exercise Documentation Form

Notification Exercise

1. Date performed: _____
2. Exercise or actual response? _____
3. Vessel/Facility/Pipeline/Offshore Facility initiating exercise: _____
4. Name of person notified _____
Is this person identified in your response plan as qualified individual Or designee? _____
5. Time initiated: _____
Time in which qualified individual or designee responded _____
6. Method used to contact:
____ Telephone
____ Pager
____ Radio
____ Other _____
7. Description of notification procedure:

8. Identify which of the 15 core components of your response plan were exercised during this particular exercise:

Certifying Signature

Retain this form for a minimum of 3 years (for USCG/RSPA/MMS) or 5 years (for EPA).

For vessel qualified individual notification, ensure log entry is also made and retained for a minimum of 3 years.

Internal Exercise Documentation Form

Emergency Procedures Exercise

1. Date performed: _____
2. Exercise or actual response ? _____
If an exercise, announced or unannounced? _____
3. Location: _____
4. Vessel/Barge/Facility name: _____
5. Time started: _____
Time completed: _____
6. Sections of Vessel/Barge/Facility emergency procedures exercised (i.e., response to collision, response to oil spill on deck, response to vessel fire, etc.)? _____

7. Description of exercise: _____

8. Identify which of the 15 core components of your response plan were exercised during this particular exercise: _____

Emergency Procedures Exercise (continued)

9. Attach a description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures.

Certifying Signature

Retain this form for a minimum of 3 years (for USCG/RSPA/MMS) and 5 years (for EPA).

For manned vessels, ensure log entry is made and retained for 3 years.

Internal Exercise Documentation Form

Spill Management Team Tabletop Exercise

1. Date(s) performed: _____
2. Exercise or actual response? _____
If an exercise, announced or unannounced? _____
3. Location of tabletop: _____
4. Time started: _____
Time completed: _____
5. Response plan scenario used (check one):
_____ Average most probable discharge
_____ Maximum most probable discharge
_____ Worst case discharge
_____ Size of (simulated) spill-bbls/gals
6. Describe how the following objectives were exercised:
 - a) Spill management team's knowledge of oil-spill response plan:

 - b) Proper notifications:

Spill Management Team Tabletop Exercise (continued)

c) Communications system:

d) Spill management team's ability to access contracted oil spill removal organizations:

e) Spill management team's ability to coordinate spill response with On-Scene Coordinator, state and applicable agencies:

f) Spill management team's ability to access sensitive site and resource information in the Area Contingency Plan:

Spill Management Team Tabletop Exercise (continued)

7. Identify which of the 15 core components of your response plan were exercised during this particular exercise:

8. Attach a description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures.

Certifying Signature

Retain this form for a minimum of 3 years (for USCG/RSPA/MMS) or 5 years (for EPA).

Internal Exercise Documentation Form

Equipment Deployment Exercise

1. Date(s) performed: _____
2. Exercise or actual response? _____
If an exercise, announced or unannounced? _____
3. Deployment location(s):

4. Time started: _____
Time OSRO/HSRO called _____
Time on-scene _____
Time boom deployed _____
Time recovery equipment arrives on-scene _____

Time completed: _____
5. Equipment deployed was:
____ Facility-owned
____ OSRO/HSRO-owned if so, which
OSRO/HSRO? _____
Both _____

Equipment Deployment Exercise (continued)

6. List type and amount of all equipment (e.g., boom and skimmers) deployed and number of support personnel employed:

7. Describe goals of the equipment deployment and list any Area Contingency Plan strategies tested. (Attach a sketch of equipment deployments and booming strategies):

8. For deployment of facility-owned equipment, was the amount of equipment deployed at least the amount necessary to respond to your facility's average most probable spill?

Was the equipment deployed in its intended operating environment?

Equipment Deployment Exercise (continued)

9. For deployment of OSRO/HSRO-owned equipment, was a representative sample (at least 1000 feet of each boom type and at least one of each skimmer type) deployed?

Was the equipment deployed in its intended operating environment?

10. Are all facility personnel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved in a comprehensive maintenance program? _____

If so, describe the program: _____

Date of last equipment inspection: _____

11. Was the equipment deployed by personnel responsible for its deployment in the event of an actual spill? _____

12. Was all deployed equipment operational? If not, why not?

13. Identify which of the 15 core components of your response plan were exercised during this particular exercise: _____

14. Attach a description of lesson(s) learned, procedures and schedule for implementation, and person(s) responsible for follow up of corrective measures.

Certifying Signature

Retain this form and other documentation related to this exercise on file for a minimum of 3 years (for USCG/RSPA/MMS) or for a minimum of 5 years (for EPA).

Triennial CYLCLE Documentation FORM

													Core Components														
	CY				Year CY				CY				Notification	Staff Mobilization	Operate in RMS	Discharge Contained	Assessment	Containment	Recovery	Protection	Disposal	Communications	Transportation	Personnel Support	Equipment Maint.	Procurement	Documentation
	Quarters				Quarters				Quarters																		
	1	2	3	4	5	6	7	8	9	10	11	12															
QI Notification																											
Emergency Procedures																											
SMT Tabletop																											
Equipment Deployment																											
OSRO/HSRO Equipment Deployment																											
Gov't-initiated Unannounced																											
Area Exercise																											

For each quarter in which an exercise was completed, mark that with an "X" then mark each core component tested during an exercise.

APPENDIX B: RESPONSE PLAN CORE COMPONENTS

During each triennial cycle, all components of a plan holder's response plan must be exercised at least once. The purpose of this requirement is to ensure that all plan components function adequately for response to an oil spill.

The 15 core components listed below are the types of components that must be exercised. However, these components may not be contained in each response plan. As such, the plan holder shall identify those that are applicable from this list, adding or deleting as appropriate.

1. Notifications: Test the notifications procedures identified in the Area Contingency Plan and the associated Responsible Party Response Plan.
2. Staff Mobilization: Demonstrate the ability to assemble the spill response organization identified in the Area Contingency Plan and associated Responsible Party Response Plan.
3. Ability to Operate Within the Response Management System Described in the Plan:
 - 3.1 Unified Command: Demonstrate the ability of the spill response organization to work within a unified command
 - 3.1.1 Federal Representation: Demonstrate the ability to consolidate the concerns and interests of the other members of the unified command into a unified strategic plan with tactical operations.
 - 3.1.2 State Representation: Demonstrate the ability to function within the unified command structure.
 - 3.1.3 Local Representation: Demonstrate the ability to within the unified command structure.
 - 3.1.4 Responsible Party Representation: Demonstrated(to function within the unified command structure

RESPONSE PLAN CORE COMPONENTS (continued)

- 3.2. Response Management System: Demonstrate the ability of the response organization to operate within the framework of the response management system identified in their respective plans.
 - 3.2.1 Operations: Demonstrate the ability to coordinate or direct operations related to the implementation of action plans contained in the respective response and contingency plans developed by the unified command.
 - 3.2.2 Planning: Demonstrate the ability to consolidate the various concerns of the members of the unified command into joint planning recommendations and specific long-range strategic plans. Demonstrate the ability to develop short-range tactical plans for the operations division.
 - 3.2.3 Logistics: Demonstrate the ability to provide the necessary support of both the short-term and long-term action plans.
 - 3.2.4 Finance: Demonstrate the ability to document the daily expenditures of the organization and provide cost estimates for continuing operations.
 - 3.2.5 Public Affairs: Demonstrate the ability to form a joint information center and provide the necessary interface between the unified command and the media.
 - 3.2.6 Safety Affairs: Demonstrate the ability to monitor all field operations and ensure compliance with safety standards.
 - 3.2.7 Legal Affairs: Demonstrate the ability to provide the unified command with suitable legal advice and assistance.
4. Source Control: Demonstrate the ability of the spill response organization to control and stop the discharge at the source.
 - 4.1 Salvage: Demonstrate the ability to assemble and deploy salvage resources identified in the response plan.
 - 4.2 Firefighting: Demonstrate the ability to assemble and deploy the firefighting resources identified in the response plan.

RESPONSE PLAN CORE COMPONENTS (continued)

- 4.3 **Lightering:** Demonstrate the ability to assemble and deploy the lightering resources identified in the response plan.
- 4.4 **Other salvage equipment and devices:** (electrical and manual controls and barriers to control the source) Demonstrate the ability to assemble and deploy the other salvage devices identified in the response plan
5. **Assessment:** Demonstrate the ability of the spill response organization to provide an initial assessment of the discharge and provide continuing assessments of the effectiveness of the tactical operations.
6. **Containment:** Demonstrate the ability of the spill response organization to contain the discharge at the source or in various locations for recovery operations.
7. **Recovery:** Demonstrate the ability of the spill response organization to recover, mitigate, and remove the discharged product. Includes mitigation and removal activities, e.g. dispersant use, ISB use, and bioremediation use.
- 7.1 **On-Water Recovery:** Demonstrate the ability to assemble and deploy the on-water response resources identified in the response plans.
- 7.2 **Shore-Based Recovery:** Demonstrate the ability to assemble and deploy the shoreside response resources identified in the response plans.
8. **Protection:** Demonstrate the ability of the spill response organization to protect the environmentally and economically sensitive areas identified in the Area Contingency Plan and the respective industry response plan.
- 8.1 **Protective Booming:** Demonstrate the ability to assemble and deploy sufficient resources to implement the protection strategies contained in the Area Contingency Plan and the respective industry response plan.

RESPONSE PLAN CORE COMPONENTS (continued)

- 8.2 **Water Intake Protection:** Demonstrate the ability to quickly identify water intakes and implement the proper protection procedures from the Area Contingency Plan or develop a plan for use.
- 8.3 **Wildlife Recovery and Rehabilitation:** Demonstrate the ability to quickly identify these resources at risk and implement the proper protection procedures from the Area Contingency Plan to develop a plan for use.
- 8.4 **Population Protection (Protect Public Health and Safety):** Demonstrate the ability to quickly identify health hazards associated with the discharged product and the population at risk from these hazards, and to implement the proper protection procedures from the Area Contingency Plan or develop a plan for use.
9. **Disposal:** Demonstrate the ability of the spill response organization to dispose of the recovered material and contaminated debris.
10. **Communications:** Demonstrate the ability to establish an effective communications system for the spill response organization.
- 10.1 **Internal Communications:** Demonstrate the ability to establish an intra-organization communications system. This encompasses communications at the command post and between the command post and deployed resources.
- 10.2 **External Communications:** Demonstrate the ability to establish communications both within the response organization and other entities (e.g., RRT, claimants, media, regional or HQ agency offices, non-governmental organizations, etc.).
11. **Transportation:** Demonstrate the ability to provide effective multi-mode transportation both for execution of the discharge and support functions.
- 11.1 **Land Transportation:** Demonstrate the ability to provide effective land transportation for all elements of the response.

RESPONSE PLAN CORE COMPONENTS (continued)

11.2 Waterborne Transportation: Demonstrate the ability to provide effective waterborne transportation for all elements of the response.

11.3 Airborne Transportation: Demonstrate the ability to provide the necessary support of all personnel associated with the response.

12. Personnel Support: Demonstrate the ability to provide the necessary support of all personnel associated with the response.

12.1 Management: Demonstrate the ability to provide administrative management of all personnel involved in the response. This requirement includes the ability to move personnel into or out of the response organization with established procedures.

12.2 Berthing: Demonstrate the ability to provide overnight accommodations on a continuing basis for a sustained response.

12.3 Messing: Demonstrate the ability to provide suitable feeding arrangements for personnel involved with the management of the response.

12.4 Operational and Administrative Spaces: Demonstrate the ability to provide suitable operational and administrative spaces for personnel involved with the management of the response.

12.5 Emergency Procedures: Demonstrate the ability to provide emergency services for personnel involved in the response.

13. Equipment Maintenance and Support: Demonstrate the ability to maintain and support all equipment associated with the response.

13.1 Response Equipment: Demonstrate the ability to provide effective maintenance and support for all response equipment.

RESPONSE PLAN CORE COMPONENTS (continued)

13.2 Response Equipment: Demonstrate the ability to provide effective maintenance and support for all equipment that supports the response. This requirement includes communications equipment, transportation equipment, administrative equipment, etc.

14. Procurement: Demonstrate the ability to establish an effective procurement system.

14.1 Personnel: Demonstrate the ability to procure sufficient personnel to mount and sustain an organized response. This requirement includes insuring that all personnel have qualifications and training required for their position within the response organization.

14.2 Response Equipment: Demonstrate the ability to procure sufficient response equipment to mount and sustain an organized response.

14.3 Support Equipment: Demonstrate the ability to procure sufficient support equipment to support and sustain an organized response.

15. Documentation: Demonstrate the ability of the spill response organization to document all operational and support aspects of the response and provide detailed records of decisions and actions taken

Appendix B

Planning Distance

At this outfall the water body is a losing stream with negligible flow, mostly shallow pooled water. Stream channel is approximately 40 feet wide at outfall. Calculations for stream velocity were provided by USGS at the nearest monitoring point, at Bardley, Mo (07071500) Eleven Point River monitoring station, Oregon County, Missouri.

http://waterdata.usgs.gov/mo/nwis/measurements?site_no=07071500&agency_cd=USGS&format=html_table_expanded

A 5 year average stream flow was calculated using USGS actual flow data.

$d = vtc$

v = river velocity (ft/sec)

The river velocity is estimated to be .95 ft/sec on normal days (from USGS hydrograph model) High velocity as much as 4.37 ft/sec.

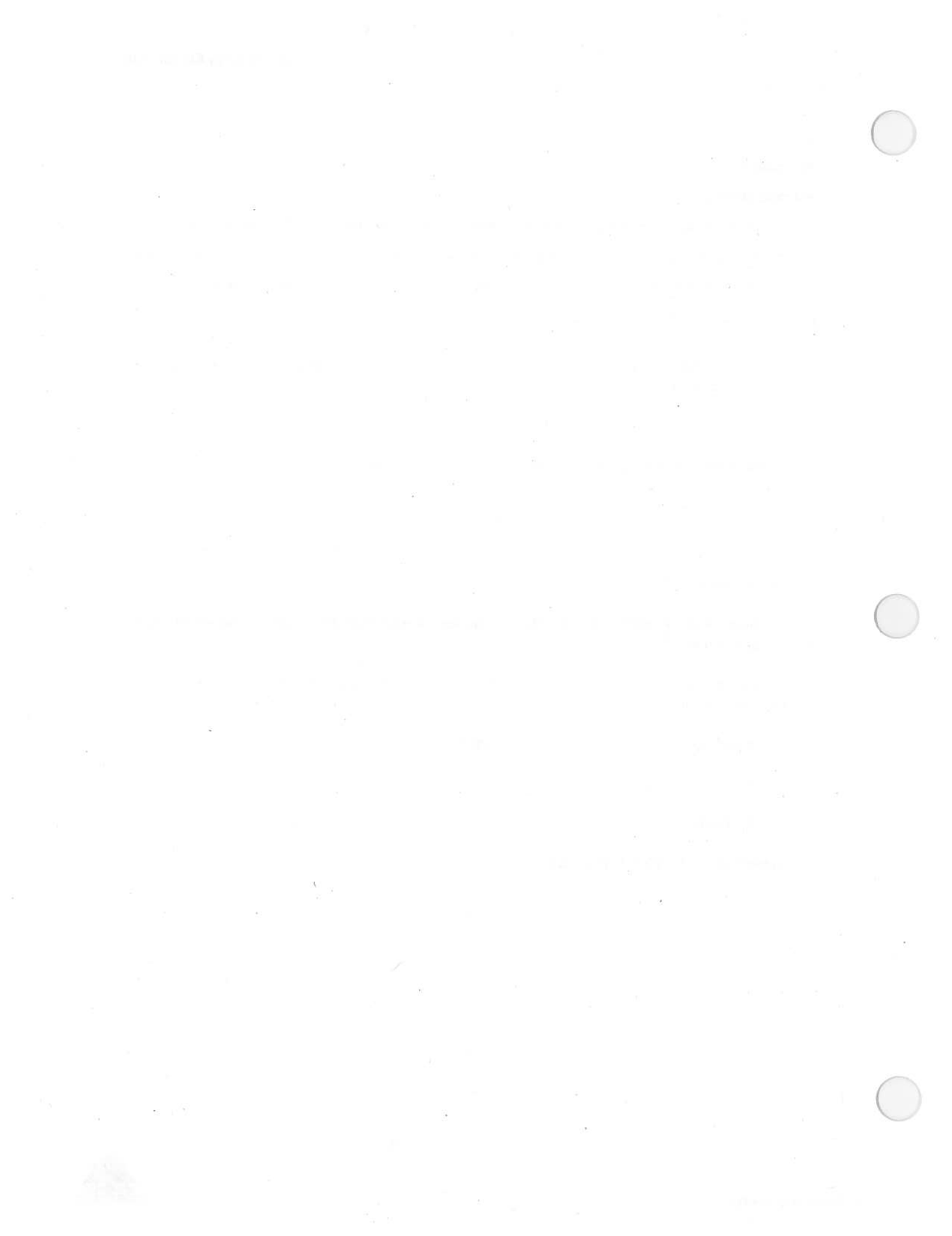
t = time interval (hours) from table 3 $t = 27$ hours (24 hour arrival and 3 hour deployment rivers and canals, inshore areas)

c = constant conversion factor 0.68 sec mile/hr ft

$d = .95 \text{ ft/sec (27 hours) } .068 \text{ sec mile/hr ft}$

$d = 17.53$ miles

Guidelines call for 20 mile minimum



Appendix C

Recordkeeping forms (Monthly Inspection, Annual Inspections, Discharge Notification, Record of Annual Discharge Prevention Meetings, Agency Annual Discharge Prevention and Training Log, Spill Response Kit Inspection Log, Spill Response Checklist

Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Bulk Oil Storage

Item	A1 - 30,000 Gallon Ethanol Tank	A2 - 30,000 Gallon Ethanol Tank	A3 - 30,000 Gallon Ethanol Tank	A4 - 30,000 Gallon Ethanol Tank	A5 - 30,000 Gallon Ethanol Tank	A6 - 30,000 Gallon Ethanol Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is there water, debris, cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipes been inspected for debris, residue, and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment, both visual and mechanical devices, have been inspected for physical damage.							
3.3(b) The liquid level equipment device is easily readable.							
3.4(a) If overfill equipment is equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed.							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

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4. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years.
5. In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required immediately following the event.

**Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Bulk Oil Storage**

Item	A7 - 30,000 Gallon Ethanol Tank	A8 - 30,000 Gallon Ethanol Tank	A9 - 30,000 Gallon Ethanol Tank	A10 - 30,000 Gallon Ethanol Tank	F1 - 20,000 Gallon Fusel Tank	F2 - 20,000 Gallon Fusel Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is there water, debris, cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipes been inspected for debris, residue, and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment, both visual and mechanical devices, have been inspected for physical damage.							
3.3(b) The liquid level equipment device is easily readable.							
3.4(a) If overfill equipment is equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed.							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

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Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Bulk Oil Storage

Item	Tank 1 - 30,000 Gallon Asphalt Oil Tank	Tank 2 - 30,000 Gallon Asphalt Oil Tank	Tank 3 - 30,000 Gallon Asphalt Oil Tank	Tank 4 - 30,000 Gallon Asphalt Oil Tank	Tank 5 - 30,000 Gallon Asphalt Oil Tank	Tank 6 - 30,000 Gallon Asphalt Oil Tank	Comments
1.0 Tank Containment							
1.1 Is there water, debris cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipes been inspected for debris residue and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment both visual and mechanical devices, have been inspected for physical damage							
3.3(b) The liquid level equipment device is easily readable.							
3.4(a) If overfill equipment is equipped with a "test button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

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Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Bulk Oil Storage

Item	Tank 7 - 210,000 Gallon Asphalt Oil Tank Yes-No-N/A	Tank 8 - 420,000 Gallon Asphalt Oil Tank Yes-No-N/A	Tank 9 - 420,000 Gallon Asphalt Oil Tank Yes-No-N/A	Tank 10 - 420,000 Gallon Asphalt Oil Tank Yes-No-N/A	Tank 11 - 420,000 Gallon Asphalt Oil Tank Yes-No-N/A	Tank 12 - 30,000 Gallon Asphalt Oil Tank Yes-No-N/A	Comments
1.0 Tank Containment							
1.1 Is there water, debris, cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipes been inspected for debris, residue, and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment, both visual and mechanical devices, have been inspected for physical damage.							
3.3(b) The liquid level equipment device is easily readable.							
3.4(a) If overfill equipment is equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed.							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

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Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Bulk Oil Storage

Item	Tank 13 - 30,000 Gallon Asphalt Oil Tank	Tank 14 - 30,000 Gallon Asphalt Oil Tank	Tank 15 - 30,000 Gallon Polymer Tank	Tank 16 - 30,000 Gallon Polymer Tank	Tank 17 - 30,000 Gallon Asphalt Oil Tank	Tank 18 - 30,000 Gallon Asphalt Oil Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is there water, debris, cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipe been inspected for debris, residue, and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment, both visual and mechanical devices, have been inspected for physical damage.							
3.3(b) The liquid level equipment device is easily readable							
3.4(a) If overfill equipment is equipped with a test button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed.							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

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Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Bulk Oil Storage

Item	Tank 19 - 30,000 Gallon Asphalt Oil Tank	Tank 20 - 30,000 Gallon Asphalt Oil Tank	Tank 21 - 30,000 Gallon Asphalt Oil Tank	Tank 22 - 30,000 Gallon Asphalt Oil Tank	Tank 23 - 30,000 Gallon Asphalt Oil Tank	Tank 24 - 30,000 Gallon Asphalt Oil Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is there water, debris, cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipes been inspected for debris, residue, and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment, both visual and mechanical devices, have been inspected for physical damage.							
3.3(b) The liquid level equipment device is easily readable.							
3.4(a) If overfill equipment is equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed.							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date: _____

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Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Bulk Oil Storage

Item	Tank B1 - 12,000 Gallon Diesel Tank	Diesel Tank 1 - 6,000 Gallon Diesel Tank	Diesel Tank 2 - 17,500 Gallon Diesel Tank	Used Oil - 1,100 Gallon Used Oil Tank			Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is there water, debris, cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipes been inspected for debris, residue, and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment, both visual and mechanical devices, have been inspected for physical damage.							
3.3(b) The liquid level equipment device is easily readable.							
3.4(a) If overfill equipment is equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed.							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date:

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Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Oil Filled Equipment

Item	Emergency Backup Generator - 400 Gallon	Used Oil Heater - 250 Gallon					Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is there water, debris, cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipes been inspected for debris, residue, and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment, both visual and mechanical devices, have been inspected for physical damage.							
3.3(b) The liquid level equipment device is easily readable.							
3.4(a) If overfill equipment is equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed.							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date: _____

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Coastal Energy - SPCC Plan
Monthly Inspection Checklist - Transformers

Item	T-1	T-2					Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is there water, debris, cracks or a fire hazard within the containment structure?							
1.2 Is water located around the primary tank?							
1.3 Are the containment drain valves operable and in a closed position?							
1.4 Are the pathways and entry clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Does the tank have visible signs of leakage?							
2.2 Does the secondary containment have visible signs of leakage from any tank into secondary containment?							
2.3 Does the surrounding soil have visible signs of leakage?							
2.4 Does the interstice have visible signs of leakage?							
3.0 Tank Equipment							
3.1(a) Are the tank valves free from leaks?							
3.1(b) Are the tank valves locked?							
3.2(a) Has the spill containment boxes on fill pipes been inspected for debris, residue, and water in the box and removed if present?							
3.2(b) Are the drain valves on the spill containment boxes and fill pipes operable and closed?							
3.3(a) The liquid level equipment, both visual and mechanical devices, have been inspected for physical damage.							
3.3(b) The liquid level equipment device is easily readable.							
3.4(a) If overfill equipment is equipped with a "test" button, activate the audible horn or light to confirm operation. This could be battery operated. Replace the battery if needed.							
3.4(b) If overfill valve is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.							
3.5 Check for leaks, corrosion and damage to the piping connections.							
4.0 Tank Attachments and Appurtenances							
4.1 Is the ladder and platform structure secure with no signs of severe corrosion or damage?							
5.0 Other Conditions							
5.1 Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?							

Inspection Date:

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Inspectors Signature:

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Coastal Energy - SPCC Plan
Portable Container Monthly Inspection Checklist - Totes

Item	Motor Oil - 120 Gallon Portable Tanks (X2)	Hydraulic Oil - 55 Gallon Drum (Multiple)	Gear Oil - 55 Gallon Drum (Multiple)	Motor Oil - 55 Gallon Drum (Multiple)			Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 AST Containment/Storage Area							
1.1 Portable containers within designated storage area?							
1.2 Debris, spills, or other fire hazards in containment or storage areas?							
1.3 Water in outdoor secondary containment?							
1.4 Drain valves operable and in a closed position?							
1.5 Egress pathways clear and gates/doors operable?							
2.0 Leak Detection							
2.1 Visible signs of leakage around the containers or storage area?							
3.0 Containers							
3.1 Noticeable container distortions, buckling, denting, or bulging?							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

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3. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years.

Coastal Energy - SPCC Plan
Annual Inspection Checklist - Bulk Oil Storage

Item	A1 - 30,000 Gallon Ethanol Tank	A2 - 30,000 Gallon Ethanol Tank	A3 - 30,000 Gallon Ethanol Tank	A4 - 30,000 Gallon Ethanol Tank	A5 - 30,000 Gallon Ethanol Tank	A6 - 30,000 Gallon Ethanol Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If applicable, record the hour meter, ampmeter and voltmeter readings of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any; dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or stading water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents: Verify that components are moving freely and vent passageways are not obstructed for: Emergency vent covers, pressure/vacuum vent poppets and other moving vent components.							
5.2 Valves: Check the condition of all valves for leaks, corrosion and damage.							
5.2.1 Ant siphon check and gate valves Cycle the valve open and closed and check for proper operation							
5.2.2 Pressure regulator valve: Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only.)							
5.2.3 Expansion relief valve: Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves: Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. (b) Valves must not be wired in open position. (c) Make sure fusible element is in place and correctly positioned. (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.							

Item	A1 - 30,000 Gallon Ethanol Tank	A2 - 30,000 Gallon Ethanol Tank	A3 - 30,000 Gallon Ethanol Tank	A4 - 30,000 Gallon Ethanol Tank	A5 - 30,000 Gallon Ethanol Tank	A6 - 30,000 Gallon Ethanol Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
5.3 Interstitial leak detection equipment: Check condition of equipment, including; the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.							
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturers expected service life. Replace if necessary. (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for; missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

1. This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance
2. This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.
3. Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure.
4. Inspect. Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination of holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
5. Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
6. Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.
7. In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.80(8)(v))
8. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years.
9. Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists
10. Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation

Coastal Energy - SPCC Plan
Annual Inspection Checklist - Bulk Oil Storage

Item	A7 - 30,000 Gallon Ethanol Tank	A8 - 30,000 Gallon Ethanol Tank	A9 - 30,000 Gallon Ethanol Tank	A10 - 30,000 Gallon Ethanol Tank	F1 - 20,000 Gallon Fuel Tank	F2 - 20,000 Gallon Fuel Tank	Comments
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If applicable, record the hour meter, ammeter and voltmeter readings of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any; dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or stading water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents: Verify that components are moving freely and vent passageways are not obstructed for: Emergency vent covers, pressure/vacuum vent poppets and other moving vent components.							
5.2 Valves: Check the condition of all valves for leaks, corrosion and damage.							
5.2.1 Anti-siphon check and gate valves: Cycle the valve open and closed and check for proper operation.							
5.2.2 Pressure regulator valve: Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only.)							
5.2.3 Expansion relief valve: Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves: Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. (b) Valves must not be wired in open position. (c) Make sure fusible element is in place and correctly positioned (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.							

Item	A7 - 30,000 Gallon Ethanol Tank	A8 - 30,000 Gallon Ethanol Tank	A9 - 30,000 Gallon Ethanol Tank	A10 - 30,000 Gallon Ethanol Tank	F1 - 20,000 Gallon Fusel Tank	F2 - 20,000 Gallon Fusel Tank	Comments
5.3 Interstitial leak detection equipment: Check condition of equipment, including: the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturer's expected service life. Replace if necessary. (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for; missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

- This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance.
- This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.
- Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure.
- Inspect. Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination of holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
- Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
- Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.
- In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years.
- Complete this checklist on an annual basis supplemental to the owner monthly performed inspection checklists.
- Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

Coastal Energy - SPCC Plan
Annual Inspection Checklist - Bulk Oil Storage

Item	Tank 1 - 30,000 Gallon Asphalt Oil Tank	Tank 2 - 30,000 Gallon Asphalt Oil Tank	Tank 3 - 30,000 Gallon Asphalt Oil Tank	Tank 4 - 30,000 Gallon Asphalt Oil Tank	Tank 5 - 30,000 Gallon Asphalt Oil Tank	Tank 6 - 30,000 Gallon Asphalt Oil Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If applicable, record the hour meter, ampmeter and voltmeter readings of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any; dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or stading water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents: Verify that components are moving freely and vent passageways are not obstructed for: Emergency vent covers, pressure/vacuum vent poppets and other moving vent components.							
5.2 Valves: Check the condition of all valves for leaks, corrosion and damage.							
5.2.1 Anti-siphon check and gate valves: Cycle the valve open and closed and check for proper operation.							
5.2.2 Pressure regulator valve: Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only.)							
5.2.3 Expansion relief valve: Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves: Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							

Item	Tank 1 - 30,000 Gallon Asphalt Oil Tank	Tank 2 - 30,000 Gallon Asphalt Oil Tank	Tank 3 - 30,000 Gallon Asphalt Oil Tank	Tank 4 - 30,000 Gallon Asphalt Oil Tank	Tank 5 - 30,000 Gallon Asphalt Oil Tank	Tank 6 - 30,000 Gallon Asphalt Oil Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. (b) Valves must not be wired in open position. (c) Make sure fusible element is in place and correctly positioned. (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.							
5.3 Interstitial leak detection equipment: Check condition of equipment, including; the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.							
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturers expected service life. Replace if necessary. (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for; missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							

Item	Tank 1 - 30,000 Gallon Asphalt Oil Tank	Tank 2 - 30,000 Gallon Asphalt Oil Tank	Tank 3 - 30,000 Gallon Asphalt Oil Tank	Tank 4 - 30,000 Gallon Asphalt Oil Tank	Tank 5 - 30,000 Gallon Asphalt Oil Tank	Tank 6 - 30,000 Gallon Asphalt Oil Tank	Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

1. This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance
2. This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.
3. Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure
4. Inspect: Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination of holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
5. Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
6. Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.
7. In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8©(8)(v)).
8. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years
9. Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists
10. Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

Coastal Energy - SPCC Plan
Annual Inspection Checklist - Bulk Oil Storage

Item	Tank 7 - 210,000 Gallon Asphalt Oil Tank	Tank 8 - 420,000 Gallon Asphalt Oil Tank	Tank 9 - 420,000 Gallon Asphalt Oil Tank	Tank 10 - 420,000 Gallon Asphalt Oil Tank	Tank 11 - 420,000 Gallon Asphalt Oil Tank	Tank 12 - 30,000 Gallon Asphalt Oil Tank	Comments
Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If applicable, record the hour meter, ammeter and voltmeter readings of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any; dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or standing water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents: Verify that components are moving freely and vent passageways are not obstructed for: Emergency vent covers, pressure/vacuum vent poppets and other moving vent components							
5.2 Valves: Check the condition of all valves for leaks, corrosion and damage.							
5.2.1 Anti-siphon check and gate valves: Cycle the valve open and closed and check for proper operation.							
5.2.2 Pressure regulator valve: Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only.)							
5.2.3 Expansion relief valve: Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves: Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							

	Tank 7 - 210,000 Gallon Asphalt Oil Tank	Tank 8 - 420,000 Gallon Asphalt Oil Tank	Tank 9 - 420,000 Gallon Asphalt Oil Tank	Tank 10 - 420,000 Gallon Asphalt Oil Tank	Tank 11 - 420,000 Gallon Asphalt Oil Tank	Tank 12 - 30,000 Gallon Asphalt Oil Tank	
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. (b) Valves must not be wired in open position. (c) Make sure fusible element is in place and correctly positioned. (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.							
5.3 Interstitial leak detection equipment: Check condition of equipment, including; the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.							
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturers expected service life. Replace if necessary. (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for; missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							

	Tank 7 - 210,000 Gallon Asphalt Oil Tank	Tank 8 - 420,000 Gallon Asphalt Oil Tank	Tank 9 - 420,000 Gallon Asphalt Oil Tank	Tank 10 - 420,000 Gallon Asphalt Oil Tank	Tank 11 - 420,000 Gallon Asphalt Oil Tank	Tank 12 - 30,000 Gallon Asphalt Oil Tank	
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

1. This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance.
2. This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.
3. Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure.
4. Inspect: Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination of holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
5. Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
6. Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.
7. In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(b)(v)).
8. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years.
9. Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.
10. Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

**Coastal Energy - SPCC Plan
Annual Inspection Checklist - Bulk Oil Storage**

	Tank 13 - 30,000 Gallon Asphalt Oil Tank	Tank 14 - 30,000 Gallon Asphalt Oil Tank	Tank 15 - 30,000 Gallon Polymer Tank	Tank 16 - 30,000 Gallon Polymer Tank	Tank 17 - 30,000 Gallon Asphalt Oil Tank	Tank 18 - 30,000 Gallon Asphalt Oil Tank	
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If applicable, record the hour meter, ampmeter and voltmeter readings of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any; dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or stading water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents: Verify that components are moving freely and vent passageways are not obstructed for Emergency vent covers, pressure/vacuum vent poppets and other moving vent components.							
5.2 Valves: Check the condition of all valves for leaks, corrosion and damage.							
5.2.1 Anti-siphon check and gate valves: Cycle the valve open and closed and check for proper operation.							
5.2.2 Pressure regulator valve: Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only.)							
5.2.3 Expansion relief valve: Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves: Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							

	Tank 13 - 30,000 Gallon Asphalt Oil Tank	Tank 14 - 30,000 Gallon Asphalt Oil Tank	Tank 15 - 30,000 Gallon Polymer Tank	Tank 16 - 30,000 Gallon Polymer Tank	Tank 17 - 30,000 Gallon Asphalt Oil Tank	Tank 18 - 30,000 Gallon Asphalt Oil Tank	
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. (b) Valves must not be wired in open position. (c) Make sure fusible element is in place and correctly positioned. (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.							
5.3 Interstitial leak detection equipment: Check condition of equipment, including; the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.							
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturers expected service life. Replace if necessary. (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for; missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							

	Tank 13 - 30,000 Gallon Asphalt Oil Tank	Tank 14 - 30,000 Gallon Asphalt Oil Tank	Tank 15 - 30,000 Gallon Polymer Tank	Tank 16 - 30,000 Gallon Polymer Tank	Tank 17 - 30,000 Gallon Asphalt Oil Tank	Tank 18 - 30,000 Gallon Asphalt Oil Tank	
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

1. This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance

2. This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.

3. Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure.

4. Inspect: Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination of holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.

5. Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.

6. Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.

7. In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8©(8)(v)).

8. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years.

9. Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.

10. Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

Coastal Energy - SPCC Plan
Annual Inspection Checklist - Bulk Oil Storage

Item	Tank 19 - 30,000 Gallon Asphalt Oil Tank	Tank 20 - 30,000 Gallon Asphalt Oil Tank	Tank 21 - 30,000 Gallon Asphalt Oil Tank	Tank 22 - 30,000 Gallon Asphalt Oil Tank	Tank 23 - 30,000 Gallon Asphalt Oil Tank	Tank 24 - 30,000 Gallon Asphalt Oil Tank	Comments
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If applicable, record the hour meter, ammeter and voltmeter readings of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any: dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or stading water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents: Verify that components are moving freely and vent passageways are not obstructed for: Emergency vent covers, pressure/vacuum vent poppets and other moving vent components.							
5.2 Valves: Check the condition of all valves for leaks, corrosion and damage.							
5.2.1 Anti-siphon check and gate valves: Cycle the valve open and closed and check for proper operation.							
5.2.2 Pressure regulator valve: Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only.)							
5.2.3 Expansion relief valve: Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves: Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							

	Tank 19 - 30,000 Gallon Asphalt Oil Tank	Tank 20 - 30,000 Gallon Asphalt Oil Tank	Tank 21 - 30,000 Gallon Asphalt Oil Tank	Tank 22 - 30,000 Gallon Asphalt Oil Tank	Tank 23 - 30,000 Gallon Asphalt Oil Tank	Tank 24 - 30,000 Gallon Asphalt Oil Tank	
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. (b) Valves must not be wired in open position. (c) Make sure fusible element is in place and correctly positioned. (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.							
5.3 Interstitial leak detection equipment: Check condition of equipment, including, the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.							
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturers expected service life. Replace if necessary. (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for: missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							

	Tank 19 - 30,000 Gallon Asphalt Oil Tank	Tank 20 - 30,000 Gallon Asphalt Oil Tank	Tank 21 - 30,000 Gallon Asphalt Oil Tank	Tank 22 - 30,000 Gallon Asphalt Oil Tank	Tank 23 - 30,000 Gallon Asphalt Oil Tank	Tank 24 - 30,000 Gallon Asphalt Oil Tank	
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

- 1 This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance.
- 2 This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.
- 3 Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure.
- 4 Inspect Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination of holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
- 5 Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
- 6 Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.
- 7 In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8©(8)(v)).
- 8 The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years.
- 9 Complete this checklist on an annual basis supplemental to the owner monthly performed inspection checklists.
- 10 Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

**Coastal Energy - SPCC Plan
Annual Inspection Checklist - Bulk Oil Storage**

	Tank B1 - 12,000 Gallon Diesel Tank	Diesel Tank 1 - 6,000 Gallon Diesel Tank	Diesel Tank 2 - 17,500 Gallon Diesel Tank	Used Oil - 1,100 Gallon Used Oil Tank			
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If applicable, record the hour meter, ampmeter and voltmeter readings of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any: dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or stading water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents: Verify that components are moving freely and vent passageways are not obstructed for: Emergency vent covers, pressure/vacuum vent poppets and other moving vent components.							
5.2 Valves: Check the condition of all valves for leaks, corrosion and damage.							
5.2.1 Anti-siphon check and gate valves: Cycle the valve open and closed and check for proper operation.							
5.2.2 Pressure regulator valve: Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only.)							
5.2.3 Expansion relief valve: Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves: Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							

	Tank B1 - 12,000 Gallon Diesel Tank	Diesel Tank 1 - 6,000 Gallon Diesel Tank	Diesel Tank 2 - 17,500 Gallon Diesel Tank	Used Oil - 1,100 Gallon Used Oil Tank			
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. (b) Valves must not be wired in open position. (c) Make sure fusible element is in place and correctly positioned. (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.							
5.3 Interstitial leak detection equipment: Check condition of equipment, including; the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.							
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturers expected service life. Replace if necessary (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for; missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							

	Tank B1 - 12,000 Gallon Diesel Tank	Diesel Tank 1 - 6,000 Gallon Diesel Tank	Diesel Tank 2 - 17,500 Gallon Diesel Tank	Used Oil - 1,100 Gallon Used Oil Tank			
Item	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

1. This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance
2. This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.
3. Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure.
4. Inspect: Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination for holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
5. Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
6. Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.
7. In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8©(8)(v)).
8. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years
9. Complete this checklist on an annual basis supplemental to the owner monthly performed inspection checklists
10. Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

**Coastal Energy - SPCC Plan
Annual Inspection Checklist - Oil Filled Equipment**

Item	Emergency Backup Generator - 400 Gallon	Used Oil Heater - 250 Gallon					
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Comments
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If applicable, record the hour meter, ampmeter and voltmeter readings of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any; dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or stading water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents: Verify that components are moving freely and vent passageways are not obstructed for: Emergency vent covers, pressure/vacuum vent poppets and other moving vent components.							
5.2 Valves: Check the condition of all valves for leaks, corrosion and damage.							
5.2.1 Anti-siphon check and gate valves: Cycle the valve open and closed and check for proper operation.							
5.2.2 Pressure regulator valve: Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only.)							
5.2.3 Expansion relief valve: Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves: Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							

Item	Emergency Backup Generator - 400 Gallon	Used Oil Heater - 250 Gallon					Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely (b) Valves must not be wired in open position (c) Make sure fusible element is in place and correctly positioned (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve							
5.3 Interstitial leak detection equipment: Check condition of equipment, including, the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.							
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturers expected service life. Replace if necessary. (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for; missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							

Item	Emergency Backup Generator - 400 Gallon	Used Oil Heater - 250 Gallon					Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

1. This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance.
2. This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.
3. Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure.
4. Inspect: Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination of holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
5. Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
6. Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.
7. In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8©(8)(v)).
8. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years.
9. Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.
10. Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

**Coastal Energy - SPCC Plan
Annual Inspection Checklist - Transformers**

Item	T-1	T-2					Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
1.0 Tank Containment							
1.1 Is the containment structure free from; holes or cracks in the containment wall or floor, washout, liner degradation, corrosion, leakage, paint failure and tank settling?							
2.0 Tank Foundation and Supports							
2.1 Evidence of tank settlement or foundation washout?							
2.2 Cracking or spalling of concrete pad or ring wall?							
2.3 Tank supports in satisfactory condition and free from corrosion, paint failure, etc.?							
2.4 Water able to drain away from tank?							
2.5 Grounding strap secured and in good condition?							
3.0 Cathodic Protection							
3.1 Is the CP system functional and includes the wire connections for galvanic systems?							
3.2(a) Operational components (power switch, meters and alarms) been inspected for working condition?							
3.2(b) If appl cable, re ord the h ur meter, ampmeter and vo tmeter read ng of the impressed current system.							
4.0 Tank Shell, Heads and Roof							
4.1 Evidence of paint failure?							
4.2 Are there any; dents, buckling, bulging, corrosion or cracking in the steel of the tank?							
4.3 Is there low points or stading water on the roof slope?							
5.0 Tank Equipment							
5.1 Vents Verify that components are moving freely and vent passageways are not obstructed for: Emergency vent covers, pressure/vacuum vent poppets and other moving vent components							
5.2 Valves Check the condition of all valves for leaks, corrosion and damage							
5.2.1 Anti siphon check and gate valves: Cycle the valve open and closed and check for proper operation							
5.2.2 Pressure regulator valve Check for proper operation (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only)							
5.2.3 Expansion relief valve Check that the valve is in the proper orientation (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)							
5.2.4 Solenoid valves Cycle power to valve to check operation (Electrical solenoids can be verified by listening to the plunger opening and closing. If no audible confirmation, the valve should be inspected for the presence and operation of the plunger.)							

Item	T-1	T-2					Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
5.2.5 Fire and shear valves: (a) Manually cycle the valve to ensure components are moving freely and that the valve handle or lever has clearance to allow valve to close completely. (b) Valves must not be wired in open position. (c) Make sure fusible element is in place and correctly positioned. (d) Be sure test ports are sealed with plug after testing is complete and no temporary test fixture or component remains connected to valve.							
5.3 Interstitial leak detection equipment: Check condition of equipment, including; the window is clean and clear in sight leak gauges, the wire connections of electronic gauges for tightness and corrosion, activate the test button, if applicable.							
5.4 Spill containment boxes on fill pipe: (a) If corrosion damage, or wear has compromised the ability of the unit to perform spill containment functions, replace the unit. (b) Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary. (c) Drain valves must be operable and closed.							
5.5 Strainer: (a) Check that the strainer is clean and in good condition. (b) Access strainer basket and check cap and gasket seal as well as bolts.							
5.6 Filter: (a) Check that the filter is in good condition and is within the manufacturers expected service life. Replace if necessary. (b) Check for leaks and decreased fuel flow.							
5.7 Flame arrestors: Follow manufacturer's instructions. Check for corrosion and blockage of air passage.							
5.8 Leak detector for submersible pump systems: Test according to manufacturer's instructions and authority having jurisdiction (AHJ). Verify leak detectors are suited and properly installed for aboveground use.							
5.9 Liquid level equipment: (a) Has equipment been tested to ensure proper operation? (b) Does equipment operate as required? (c) Follow manufacturer's instructions.							
5.10 Overfill equipment: (a) Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification. (b) Confirm device is suited for above ground use by the manufacturer.							
6.0 Insulated Tanks							
6.1 Insulation: Check condition of insulation for; missing sections, areas of moisture, mold and damage.							
6.2 Insulation cover or jacket: Check for damage that will allow water intrusion.							

Item	I-1	I-2					Comments
	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	Yes-No-N/A	
7.0 Miscellaneous							
7.1 Electrical wiring and boxes: Are they in good condition?							
7.2 Labels and tags: Ensure that all labels and tags are intact and readable.							

Inspection Date:

Inspectors Printed Name:

Inspectors Signature:

1. This Annual Inspection Checklist follows Steel Tank Institute SP001 checklist guidance
2. This AST inspection is intended for monitoring the external tank condition and containment structure. The inspection shall be performed by the owners inspector and does not have to be performed by a certified inspector.
3. Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for paint failure.
4. Inspect: Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling. Concrete containment structures and tank foundations/supports including examination for holes, washout, settling, paint failure, in addition to examination for corrosion and leakage. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
5. Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems, and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
6. Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for oil or sheen and dispose of properly.
7. In order to comply with EPA SPCC rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8©(8)(v)).
8. The completed checklists must be maintained for 36 months however, internal policy dictates that the records will be maintained for a minimum of five years
9. Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists
10. Note: If change has occurred to the tank system or containment that may affect the SPCC Plan, the should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

Coastal Energy - SPCC Plan
Rain Water Discharge from Secondary Containment Form

[illegible]

**Discharge Notification Form Agency Notification Standard Report Record of Annual Discharge
Prevention Briefings and Training Storage Area Inspection Log Sheet Aboveground Tank Inspection Log
Sheet Spill Response Kit Inspection Checklist**

DISCHARGE NOTIFICATION FORM	
Part A: Discharge Information	
General information when reporting a spill to outside authorities	
Name:	
Address:	
Telephone:	
Owner/Operator:	
Primary Contact:	
Work: Cell (24 hrs):	
Type of oil:	Discharge Date and Time:
Quantity released:	Discovery Date and Time:
Quantity released to a waterbody:	Discharge Duration:
Location/Source:	
Actions taken to stop, remove, and mitigate impacts of the discharge:	
Affected media: air water soil storm water sewer/POTW dike/berm/oil-water separator other: _____	
Notification person:	Telephone contact: Business: 24-hr:
Nature of discharges, environmental/health effects, and damages: Injuries, fatalities or evacuation required?	

Part B: Notification Checklist		
	Date and time	Name of person receiving call
Discharge in any amount		
Type of product	Time of notification	Amount in gallons
Discharge in any amount and affecting (or threatening to affect) a waterbody		
Local Fire Department		
Department of Natural Resources (573) 634-2436		
National Response Center (800) 424-8802		
Environmental Works, Inc. (877) 827-9500		

AGENCY NOTIFICATION STANDARD REPORT	
Facility: Coastal Energy Corporation	
Owner/operator: David Montgomery	
Name of person filing report:	
Location:	
Maximum storage capacity:	
Daily throughput:	
Nature of qualifying incident(s).	

Description of facility (attach maps, flow diagrams, and topographical maps -

Agency Notification Standard Report (cont'd)
<p>Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:</p>
<p>Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:</p>
<p>Additional preventive measures taken or contemplated to minimize possibility of recurrence:</p>
<p>Other pertinent information:</p>

[illegible]

Briefings will be scheduled and conducted by the Safety Officer or QI for operating personnel at regular intervals to ensure adequate understanding of the SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

[illegible]

STORAGE AREA INSPECTION LOG SHEET

Location (Building Number or Map Reference Code):	
Inspected by:	Title:
Signature:	Date of Inspection:

Drums

1. Any evidence of faulty seals or missing plugs?	Yes	No
2. Any labels missing?	Yes	No
3. Any evidence of corrosion, cracks, or bulges?	Yes	No
4. Any drums inadequately secured from tipping or rolling?	Yes	No
5. Any evidence of spills or leaks?	Yes	No

6. Any evidence of tank overheating or malfunction?	Yes	No
7. Any labels missing?	Yes	No
8. Any evidence of tank corrosion, cracks, or bulges?	Yes	No
9. Any evidence of oil spills or leaks?	Yes	No

Indoor Containment Area

- | | | |
|------------------------------------|-----|----|
| 10. Any spills or leaks? | Yes | No |
| 11. Excessive debris accumulation? | Yes | No |

For any items above which "Yes" was checked, please comment below.

STORAGE AREA INSPECTION LOG SHEET

Inspection Item No. from List	Describe Condition	Describe Corrective Action Needed	Person Responsible for Correction Action	Date Responsible Person Notified	Date Corrective Action Completed

SPILL RESPONSE KIT INSPECTION CHECKLIST

Location (Building Number or Map Reference Code):	
Inspected by:	Title:
Signature:	Date of Inspection:

1. Is the spill kit label missing?	Yes	No
2. Is the spill kit hard to find?	Yes	No
3. Is the spill kit missing?	Yes	No
Gloves? Goggles? Absorbent material?		
4. Is the spill kit open?	Yes	No

Item	expected quantity	on hand
Boom		
Absorbent pads		
oil dry bags		
roll sorbent		
plug kit		
shovels		
rakes		
nitrile gloves		
leather gloves		

For any items above which "Yes" was checked, please comment:

SPILL RESPONSE KIT INSPECTION LOG

Equipment Description	Describe Discrepancy Between Equipment List and Actual Equipment at this Location	Describe Corrective Action Needed (Specify Replacement Date if Shelf Life will be exceeded by next Inspection Date)	Person Responsible for Correction Action	Date Responsible Person Notified	Date Corrective Action Completed

APPENDIX D PLANNING VOLUME WORKSHEET

I. Background Information

A. Worst Case Discharge (barrels)

$$2,502,000 \text{ gal} \times \frac{\text{barrel}}{42 \text{ gal}} = \underline{\underline{59,571 \text{ bbls}}}$$

B. Oil Group

Group 5

Asphaltic oil and chip and seal combined polymers are all Group 5 persistent oils. These oils are highly persistent with a relative persistence ranking of 1,600 or extremely persistent. These oils have a specific gravity equal or greater than 1.0. Planning distance meet for USEPA and Coast Guard requirements is 15 miles from the facility for persistent oils.

C. Geographic Area

Choose 1: Nearshore/Inland Great Lakes

Rivers and Canals

D. Percentages of Oil (Table 2)

The facility has 2,472,000 of Asphaltic Oil in various blends that are categorized as a Group V Persistent Oil. The material has a specific gravity over 1.0 and is further defined as follows:

- very low volatility
- little if any evaporation
- very high viscosity
- very low acute toxicity
- can form stable emulsions
- little if any penetration of substrata

Specific response resources will be employed to recover the Group V Oil, then remediate the site.

*Planning the total volume for worst case scenario includes 2,472,000 gallons storage tanks (without immediate containment) plus 30,000 gallons (largest tank with secondary containment) for a total planning volume of 2,502,000 gallons as specified by rule.

Appendix E

Boom placement diagrams

Fig. 1

BOOM PLACEMENT IN RUNNING WATER

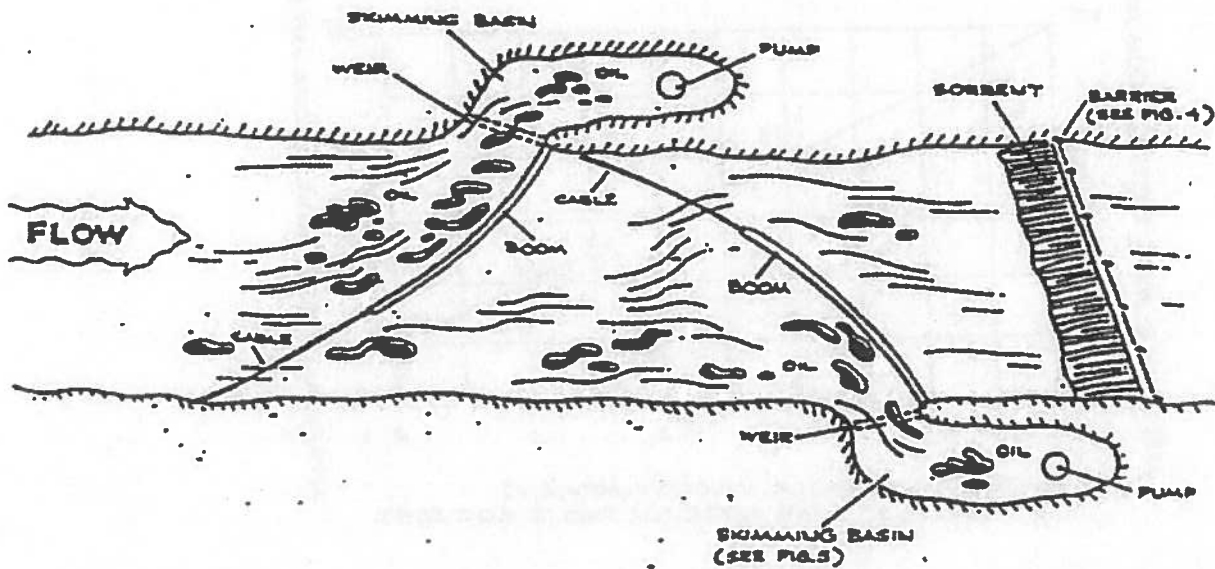
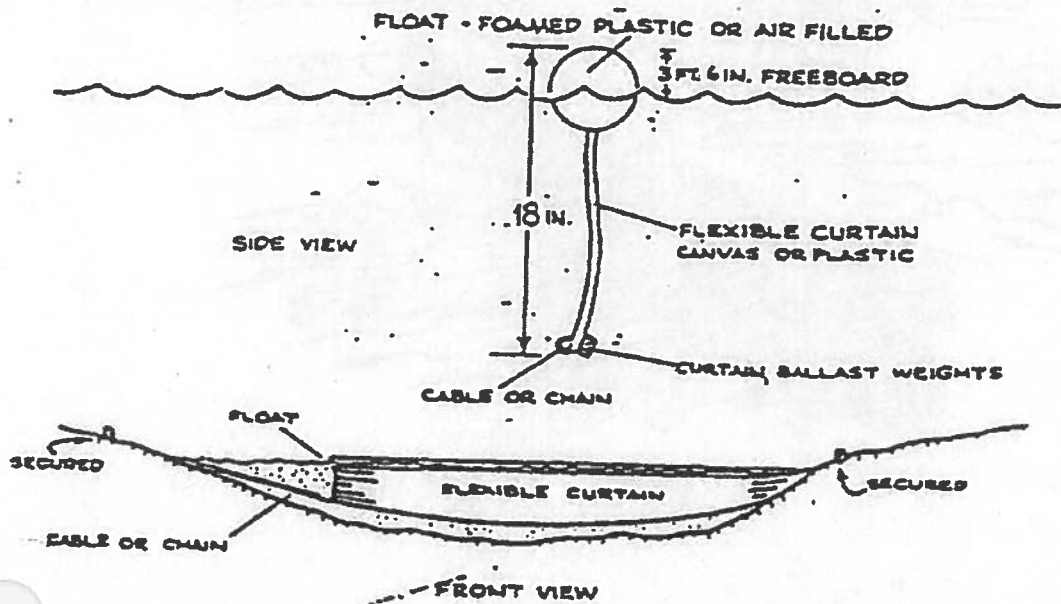


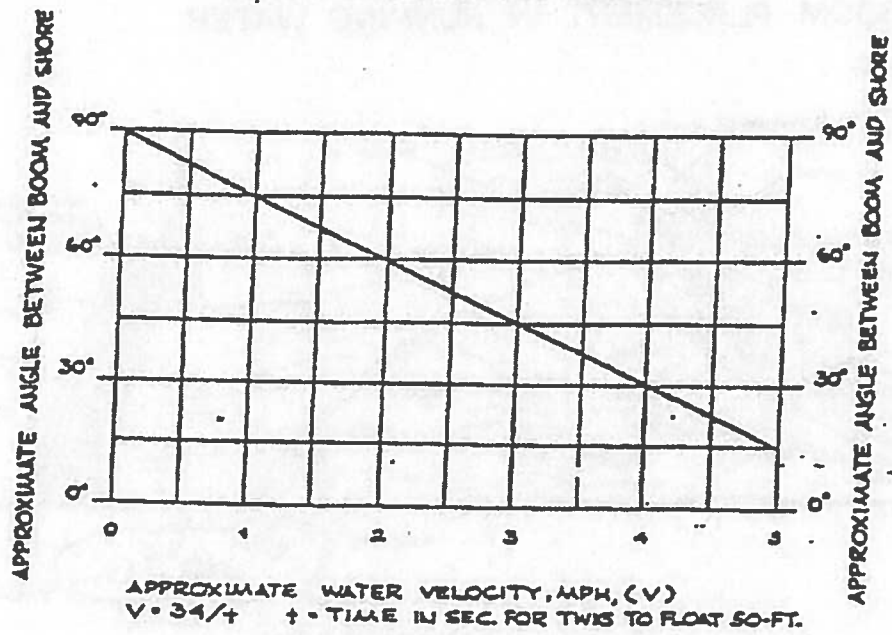
Fig. 2

CURTAIN BOOM



BOOM PLACEMENT ANGLES

Fig.3



SORBENT BARRIER

Fig.4

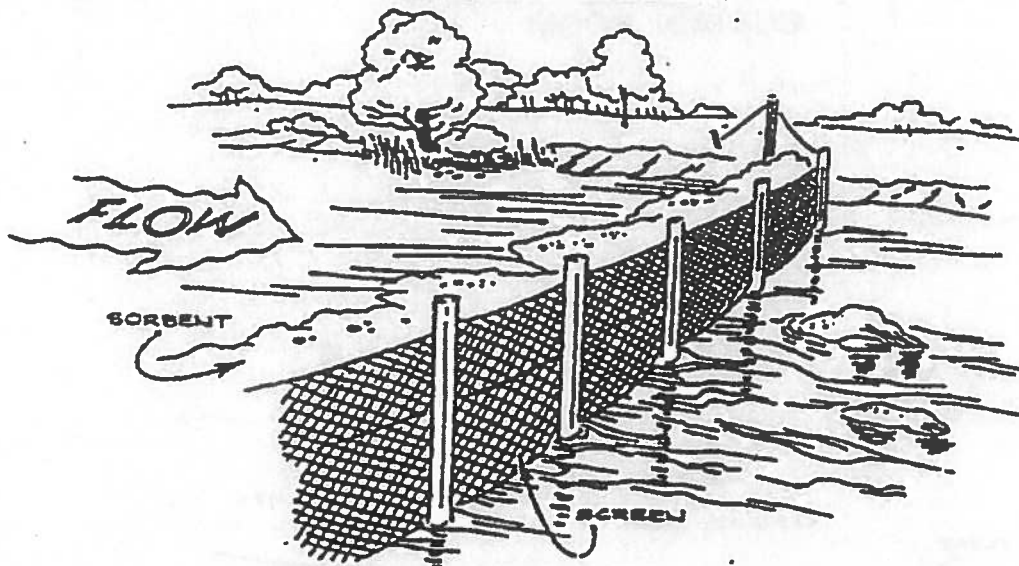


Fig. 7

FLOATING PUMP OR SKIMMER

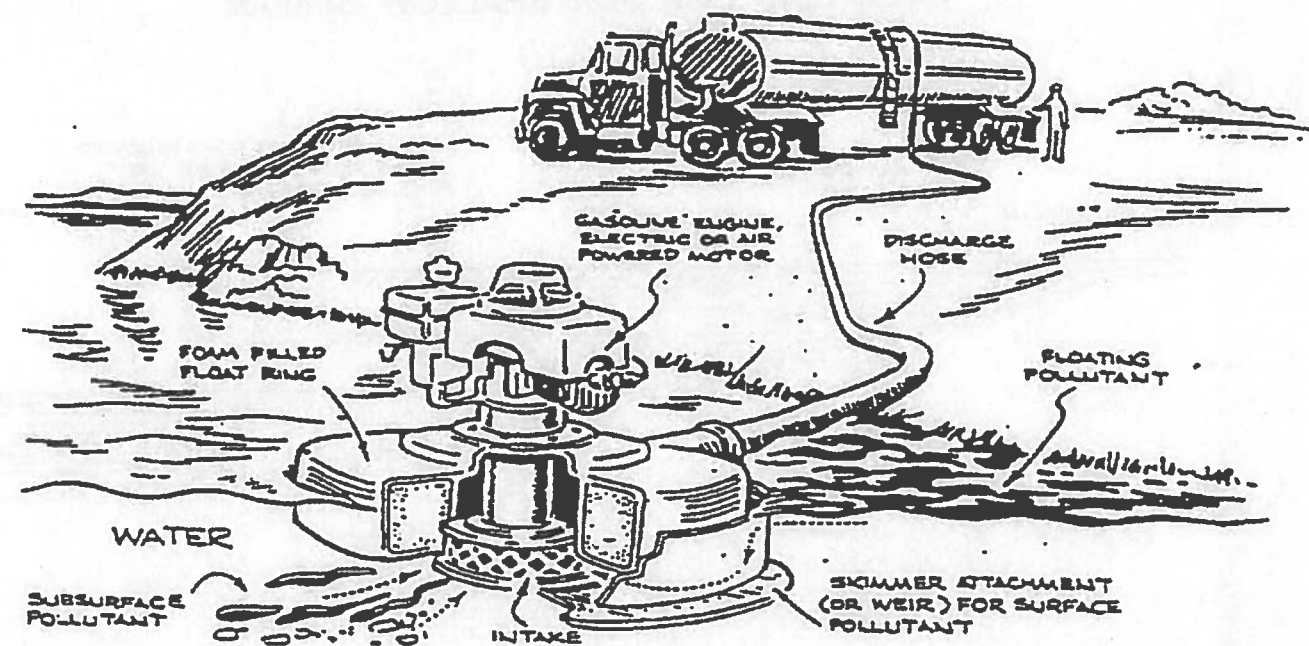


Fig. 8

CONTAINMENT DAM

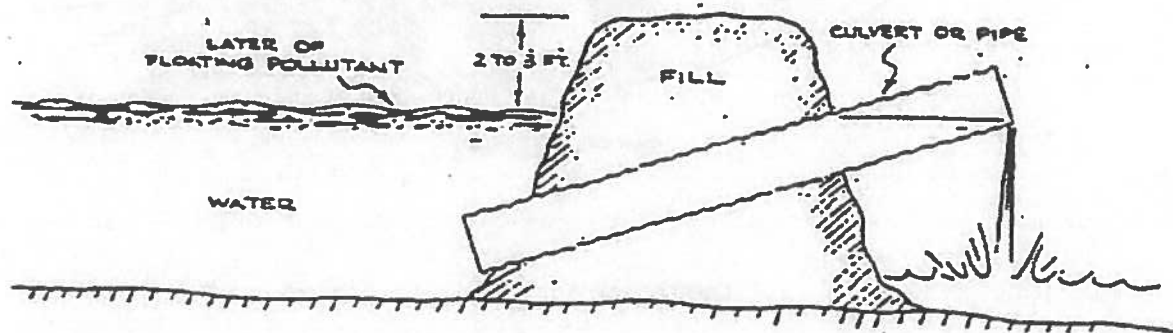
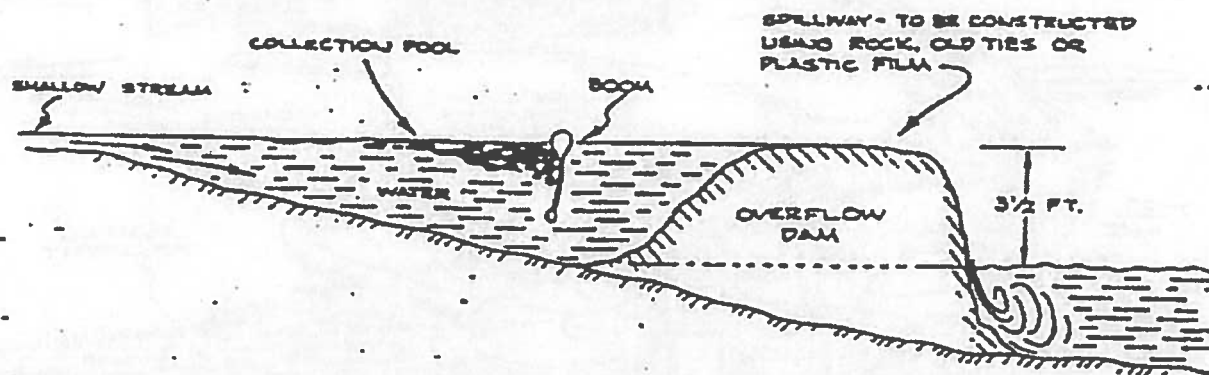
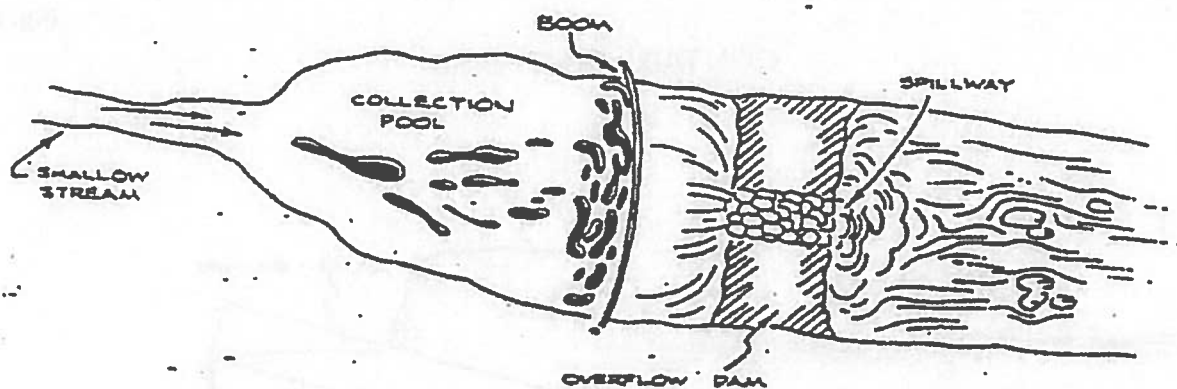


Fig. 9

OVERFLOW DAM FOR SHALLOW STREAM



SIDE VIEW



OVERHEAD VIEW



Appendix F

Emergency Response Plan (stand alone document)

EMERGENCY
RESPONSE ACTION
PLAN (ERAP)
Stand-alone document (12/20/10)



COASTAL ENERGY CORPORATION

EMERGENCY RESPONSE ACTION PLAN (ERAP)

Stand-alone document 112.20(h)(1)

6/27/2014

EMERGENCY RESPONSE ACTION PLAN (ERAP) Stand-alone document 112.20(h)(1)

The Emergency response plan is bound separately and placed in the front of the binder for easy access during an emergency or spill. It contains as much information as necessary to respond to an emergency or spill and is arranged so response actions are not delayed.

The Emergency Response Plan contains:

- Qualified Individual Information
- Emergency Notification Phone List
- Spill Response Notification Form
- Response Equipment List and Location
- Response Equipment Testing and Deployment
- Facility Response Team Information
- Evacuation Plan
- Facility Diagrams

	RESPONSE PLAN COVER SHEET
FACILITY NAME	COASTAL ENERGY CORPORATION
LOCATION	234 BURNHAM ROAD
CITY	WILLOW SPRINGS
COUNTY	HOWELL
STATE	MISSOURI
LATITUDE	36 deg 58' 31" N
LONGITUDE	91 deg 57" 7" W
Phone	417 469 2777
PLANT MANAGER	Scott Altermatt
SIC CODE	1422
LARGEST TANK IN SERVICE	420,000 gallons
MAXIMUM OIL STORAGE CAPACITY	2,812,000 gallons
WORST CASE OIL DISCHARGE	2,502,000 gallons, 420,000 single largest tank
DISTANCE TO NAVIGABLE WATER	200 feet
NUMBER OF STORAGE TANKS	38

CONTACT LIST	RESPONSIBLE ROLE	PHONE NUMBER
CONTACTS		
<u>Primary contact</u> Gary Picard Safety Officer	Notification to agencies; Emergency Response initiation	(417) 469-2777 Office (417) 469 3312 Home (417) 855-0194 Cell
<u>Secondary contact</u> Scott Altermatt David Montgomery	Notification to agencies; Emergency Response initiation	(417) 252 1060 cell (417) 252 1050 cell
GOVERNMENTAL CONTACTS		
National Response Center	Incident reporting (if required)	1 (800) 424-8802
Federal On-Scene Coordinator (EPA Region VII)	Incident reporting; Spill response assistance	(913) 281-0991 or (913) 551-7000
State Emergency Response Commission (SERC)	Incident reporting	1 (800) 780-1014
Missouri Department of Natural Resources	Incident reporting; Spill response assistance	(573) 634-2436
Fire Department / Police Department	Traffic and crowd control; Evacuation	911
EMERGENCY RESPONSE CONTRACTORS:		
Environmental Works, Inc.	Spill response and clean up resources	(417) 890-9500 (office) (877) 827-9500 (24-hour)
OTHER CONTACTS		
National Weather Service (St. Louis, MO)	Weather reports	(636) 441-8467
KUKU 100.3 1450 NEWS RADIO KWPM KSPQ 93.9	Public information	(888) 581-4487 (417) 256 1025 (417) 256 1025 (417) 256 3131
Missouri One-Call	Utility location	1(800) 344-7483
Texas County Memorial Hospital 716 Main St. Cabool, MO Mercy St Francis Hospital 100 W highway 60, Mountain View , MO Ozarks Medical Center 1100 Kentucky Ave, West Plains, MO	Medical assistance	(417) 962-5303 (417) 934-7000 (417) 256-9111

CONTACT LIST	RESPONSIBLE ROLE	PHONE NUMBER
CONTACTS		
Primary contact Gary Picard Safety Officer	CAN RESPOND WITHIN 5 MINUTES Notification of response agencies; spill reporting	(417) 469-2777 Office (417) 469 3312 Home
Secondary contact Scott Altermatt David Montgomery	CAN RESPOND IN 5 MINUTES Notification of response agencies; spill reporting reporting	(417) 855-0194 Cell (417) 469-2777 Office (417) 252 1060 (417) 252 1050
GOVERNMENTAL CONTACTS		
National Response Center	Incident reporting (if required)	1 (800) 424-8802
Federal On-Scene Coordinator (EPA Region VII)	Incident reporting; Spill response assistance 3 hour response time	(913) 281-0991 or (913) 551-7000
State Emergency Response Commission (SERC)	Incident reporting 3 hour response time	1 (800) 780-1014
Missouri Department of Natural Resources	Incident reporting; Spill response assistance 1hr 32 minutes response time	(573) 634-2436
Fire Department / Police Department	Traffic and crowd control; Evacuation assistance 5 minute response time	911
EMERGENCY RESPONSE CONTRACTORS:		
Environmental Works	Spill response and clean up resources 1hr 32 minutes response time	(417) 890-9500 (office) (877) 827-9500 (24-hour)
OTHER CONTACTS		

**THIS LISTING WILL REMAIN POSTED BY ALL TELEPHONES AND BE FREQUENTLY
UPDATED**

MEASURES TO SECURE SOURCE OF DISCHARGE

COASTAL will allocate all listed equipment in the Facility Response Plan to secure all sources of discharges. As previously discussed COASTAL will employ a safety first model in making attempts to secure a substantial leak from a vessel. If necessary, COASTAL will call in their contractor (Environmental Works, Inc.) to assist with this repair. (877) 827-9500 (24-hour)

Routinely COASTAL has the necessary equipment on sight to stop most pipe splits or cap pipes or hoses temporarily to eliminate a leak.

3.3 Emergency Equipment List and Location

Coastal will rely on OSRO and other emergency contractors to respond to a spill. Coastal does maintain response equipment inventory sufficient to only address smaller spills. Table 3 identifies the type and location of the emergency response equipment, including personal protective equipment available at the facility. These materials should be routinely inventoried and inspected. They should also be replenished or replaced as needed.

Table 3

COASTAL EMERGENCY EQUIPMENT	All material is in emergency trailer, equipment is staged by warehouse
9-SAFETY CONES	5-BAGS GRANULAR ABSORBENT
1 -AXE	10-BAGS SPHAG SORB
2-HEAVY ROCK RAKE	50-18"X18" WHITE OIL ONLY SORBENT PILLOWS
4-SHOVELS	14-18"X8" WHITE OIL ONLY SORBENT PILLOWS
1-BROOM	200-17"X19" WHITE OIL ONLY SROBENT PADS
5-HARD HATS	1-38"X144' WHITE OIL ONLY SORBENT ROLL
5-FACE SHIELDS	32-2"X4' WHITE OIL ONLY SOCKS
5-SAFETY GLASSES	7-2"X8' WHITE OIL ONLY SOCKS
1-TYVEK SUIT	3-4"X8' WHITE OIL ONLY BOOMS
4-MULTI PURPOSE COVERALLS	8-8"X10' WHITE OIL ONLY BOOMS
3-TYPE 270 OIL ABSORBENT BOOMS	Caterpillar TC-30 Forklift Hard Surface Only 2500lb capacity
Lull 944 E 42' boom fork attachment	3000 Ford Tractor with 5' Box Blade
Case 621 B articulating rubber tire loader 3 yd. bucket	225 Caterpillar skid steer with 1yrd bucket attachment and forklift attachment.
1988 Ford Dump Truck	Caterpillar TC-30 Forklift Hard Surface Only 2500lb capacity
1991 Toyota Pickup	JLG Man Lift 80HX 500lb capacity
1 Service Truck with 3" product pump	3000 Ford Tractor with 5' Box Blade
1 3" Gas Powered Trash pump	225 Caterpillar skid steer with 1yrd bucket attachment and forklift attachment.

SPILL NOTIFICATION FORM

3.1 Emergency Spill Notification Form - Form-1

FORM 1 - SPILL NOTIFICATION INFORMATION FORM			
Reporter's Last Name:	First:	Middle Initial:	Reporter's Company Position:
Phone Number(s) :			
Facility Name: COASTAL ENERGY CORPORATION	Owners Name: DAVID MONTGOMERY- President	Organization Type : SIC CODE 1422	
234 Burnham Road, Willow Springs			State: MISSOURI Zip: 65793
Were Materials Released: (Y/N)		Confidential : (Y/N)	
Meeting Federal Obligations to Report (Y/N)		Date Called:	
Calling for Responsible Party: (Y/N)		Time Called:	
Incident Description			
Source and/or Cause of Incident:			
Date:		Time of Incident:	
Incident Address/Location :			
Container Types: ethanol, asphaltic oil, fuel oil, polymer Tank Capacity : Units: gallons			
Facility Capacity : 2,812,000		Units: gallons	
Facility Latitude: 36 degrees 58' 31" N			
Facility Longitude : 91 degrees 57' 7" W			

List of Employees and Duties:

Gary Picard - Safety officer and Qualified Individual (QI). Plans for and conducts training, addresses spill response activities at the plant and coordinates response for actual spill. Gary will be the final decision maker on evacuation of the facility in a worst case scenario and on spill clean-up of any size.

In the event Gary is unavailable

Scott Altermatt - will be secondary QI Scott is the facility manager and head of maintenance. David Montgomery - will be the QI if both Gary and Scott are not available. David is the president of the company.

Garry Barton- plt manager, responsible for plant operations, scheduling other employees, unloading rail cars, trucks, pulling samples for testing, truck loading, plt maintenance, etc.

Staff

Gary Roberts- plant maintenance, hooking up rail cars for heating, unloading cars and trucks, loading trucks, making sure shipping papers are in order, etc.

Marty Makowski- responsible for proper blending of PMA asphalt, operation of skid system, operation of blower system, lab testing, boiler operation and maintenance, assists with unloading of rail cars and trucks, and loading of trucks for outbound shipments.

Ray Brotherton- assists Marty with blending, lab testing, boiler operation and also unloads rail cars, trucks and truck loading of out bound shipments. Also, assists with general plant maintenance and operation.

COASTAL plans to purchase adequate spill containers to address medium spills. Four 55gallon steel drums will be stored with emergency response equipment to address small and medium spills

Storage tanks are currently only numbered. Tanks will be affixed with appropriate hazard class signs.

There are two rally points on the topographic map that is attached. Also there is one fire hydrant on property and another on Burnham Rd. All locations of all Fire Extinguishers and emergency Eyewash stations and shower are listed on the map.

OIL SPILL CONTINGENCY PLAN

General Procedures in the Event of a Spill

- Safety First: assess the scene to determine safety hazards, the source or cause of the spill and the nature and volume of the spill.
- Immediately stop work and notify all personnel in the vicinity. Immediately notify supervisors of any chemical, fuel or oil spill. Turn off engines, ensure there are no sources of ignition within the spill area and ventilate as much as possible.
- Appropriate personal protective equipment including respirators to contain and recover spills. Implement measures to stop the leak or source of the spill and begin to contain the spill provided it is safe to do so. Dike area to contain the spill, prevent spill from reaching a watercourse, drain or exposed soil. Use proper spill recovery supplies to contain and recover the spilled material. Allow gasoline to evaporate, to minimize risk of potential ignition.
- Supervisors are to immediately report any spills of fuel or oil of 55 gallons or more by calling the DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL EMERGENCY RESPONSE at 1-573 634 2436.
- Treat contaminated spill recovery supplies as hazardous wastes and handle and dispose of these accordingly.
- Re-stock spill recovery supplies to replace those that have been used.
- After containment and recovery have been completed the Supervisor is to ensure that a Spill Report Form is submitted to the EMS database.

Note – if more than 50 gallons of Ethanol has been spilled do not attempt to clean up the material. Evacuate personnel to a location upwind and notify vehicle and other equipment operators of the spill to avoid ignition of the gasoline. Contact the fire department immediately. Attempt to divert or otherwise prevent gasoline from entering storm drains and ditches, or from entering watercourses or exposed soils. Ensure that those managing the spill approach from upwind, wearing appropriate protective gear including respirators equipped with organic vapor cartridges.

SMALL SPILLS

SPILLS OF 2,100 GALLONS OR LESS

The Safety Officer and Qualified Individual (Gary Picard) will lead on site personnel. Gary and his staff will address small spills resulting from hose leaks, dripping seals, or other factors causing a release of 2,100 or less dependent on the material released.

For heavy oil products, diesel and polymer spills, the on site staff will remediate using absorbent pads and loose material, removing the material to an approved storage vessel and disposing the material as required by regulation.

In the case of a highly flammable release (Ethanol) the following precautions apply:

Ethanol is colorless and highly flammable

Eliminate all ignition sources , flames and sparks

Area must be well ventilated

Equipment used in handling the product must be grounded

Do not touch or walk through spilled material
Stop leaks only if you can do it without risk
A vapor suppressing alcohol resistant foam may be used
Alcohol breaks down in the film of regular foam
Absorb or cover with dry earth, sand or other noncombustible material
Evacuate the facility as necessary to predetermined rendezvous points

MEDIUM SIZED DISCHARGES

SPIILLS BETWEEN 2,100 AND 36,000 GALLONS

On site personnel work to contain medium sized spills using equipment resources at the facility to trench and make temporary earthen dikes. Absorbent material will be applied as necessary to contain the material. A Qualified Emergency Contractor (Environmental Works, Inc.) will be activated to respond and remediate the spill. Material will be placed in approved roll-off vessels and will be treated as a Hazardous Waste until final disposal options are selected.

Deploy Qualified Contractor (Environmental Works, Inc.) and on site individuals to remediate the contamination. Material will be contained using booms or pads and disposed of in approved containers under the direction of the safety officer.

In the case of a highly flammable release (Ethanol) the following precautions apply:

Ethanol is colorless and highly flammable
Eliminate all ignition sources, flames and sparks
Area must be well ventilated
Equipment used in handling the product must be grounded
Do not touch or walk through spilled material
Stop leaks only if you can do it without risk
A vapor suppressing alcohol resistant foam may be used
Alcohol breaks down in the film of regular foam
Absorb or cover with dry earth, sand or other noncombustible material
Evacuate the facility as necessary to predetermined rendezvous points

LARGE SPILLS

GREATER THAN 36,000 TO 420,000 GALLONS

Initial response will include on site personnel. As described throughout this plan, staff will notify the safety officer who will in turn make an assessment of the incident and then make the notification calls to local, state or federal officials as appropriate.

If rendered safe, the on-site personnel will work to contain the spill. Calls will be made to a Qualified Contractor (Environmental Works, Inc.) to deploy to the site and execute the remediation.

If necessary the facility will be evacuated and staff will be directed to predetermined rally points dependent on existing environmental factors, such as weather and wind conditions.

In the case of a highly flammable release (Ethanol) the following precautions apply:

Ethanol is colorless and highly flammable

Eliminate all ignition sources, flames and sparks

Area must be well ventilated

Equipment used in handling the product must be grounded

Do not touch or walk through spilled material

Stop leaks only if you can do it without risk

A vapor suppressing alcohol resistant foam may be used

Alcohol breaks down in the film of regular foam

Absorb or cover with dry earth, sand or other noncombustible material

Evacuate the facility as necessary to predetermined rendezvous points

FACILITY RESPONSE SCENARIO

The most probable discharge will be less than 20 gallons from overtopping a tank or a hose or line failure. The most dangerous of the smaller spills at this facility will be Ethanol spills.

Discharges of more than 1000 gallons will require the support of outside contractors (this includes medium discharge scenario), for control, recovery and remediation efforts. Following notification, COASTAL officials will focus efforts on inhibiting the flow of spilled oil to conduits, containing the release and minimizing the impacts of the spill.

In the case of a highly flammable release (Ethanol) the following precautions apply:

Ethanol is colorless and highly flammable

Eliminate all ignition sources, flames and sparks

Area must be well ventilated

Equipment used in handling the product must be grounded

Do not touch or walk through spilled material

Stop leaks only if you can do it without risk

A vapor suppressing alcohol resistant foam may be used

Alcohol breaks down in the film of regular foam

Absorb or cover with dry earth, sand or other noncombustible material

Evacuate the facility as necessary to predetermined rendezvous points

Larger releases will involve the activation of local emergency response personnel initially, then deploy a Qualified Contractor (Environmental Works, Inc.) for site remediation and recovery efforts. Control valves will be turned to the closed position or secured otherwise, seals and plugs will be used as necessary. All ignition sources will be secured to prevent a fire.

RESPONSE EFFORT FACTORS

The topography of this site and the construction of the basin, simply will not allow any material off site. In a highly unlikely catastrophic event, the material will flow following topography of the site in an Eastward direction and rest along the side of the dike/levee system.

No impacts are foreseen to potable water supplies or to the Eleven Point River system.

3.6 Evacuation Plan

General Evacuation Instructions

- 1. Do not rush the evacuation, but depart the area are building in an orderly and safe manner.**
- 2. Evacuate to your designated location and report to your safety officer.**
- 3. In most instances you will be with someone, as a part of a team. Ensure that person or persons that you're working with arrive at the designated location. Know if someone is missing by doing a personnel call.**
- 4. Do not attempt to get your personal vehicle unless it is safe to do so and you have permission of the safety officer.**
- 5. Always evacuate to an area upwind of the release.**
- 6. Stay at your designated location until you have received further instructions or are released from duty.**
- 7. Safety officer will make a list of evacuees, Transportation of injured personnel to the nearest medical emergency facility will be conducted by ambulance or professional medical services.**

Based on the analysis of this facility, a local emergency plan has been developed to the help that includes response activity and evacuation plans for most time emergencies. This plan is available on site with the QI. Personnel safety should be considered at all times during the spill response. Evacuation routes and evacuation regrouping areas are shown on figure 2.

In case of an evacuation all employees will be notified by alarm and through radios (by safety officer or his designee) and will receive instructions as to the selection of a predetermined rendezvous location. Employees will exit in an orderly fashion. The safety officer will make certain all employees are accounted for and await further instruction from first responders. After an all clear, employees will receive further instruction.

Notable safety issues will be crossing the active rail line to established rally point 1 and rally point 2. The proximity of Ethanol tanks in case of a fire or explosion and the location of the oil storage tanks make the designated rally points attractive to allow for ingress/egress of response vehicles and provide a safe distance to ensure employee safety.

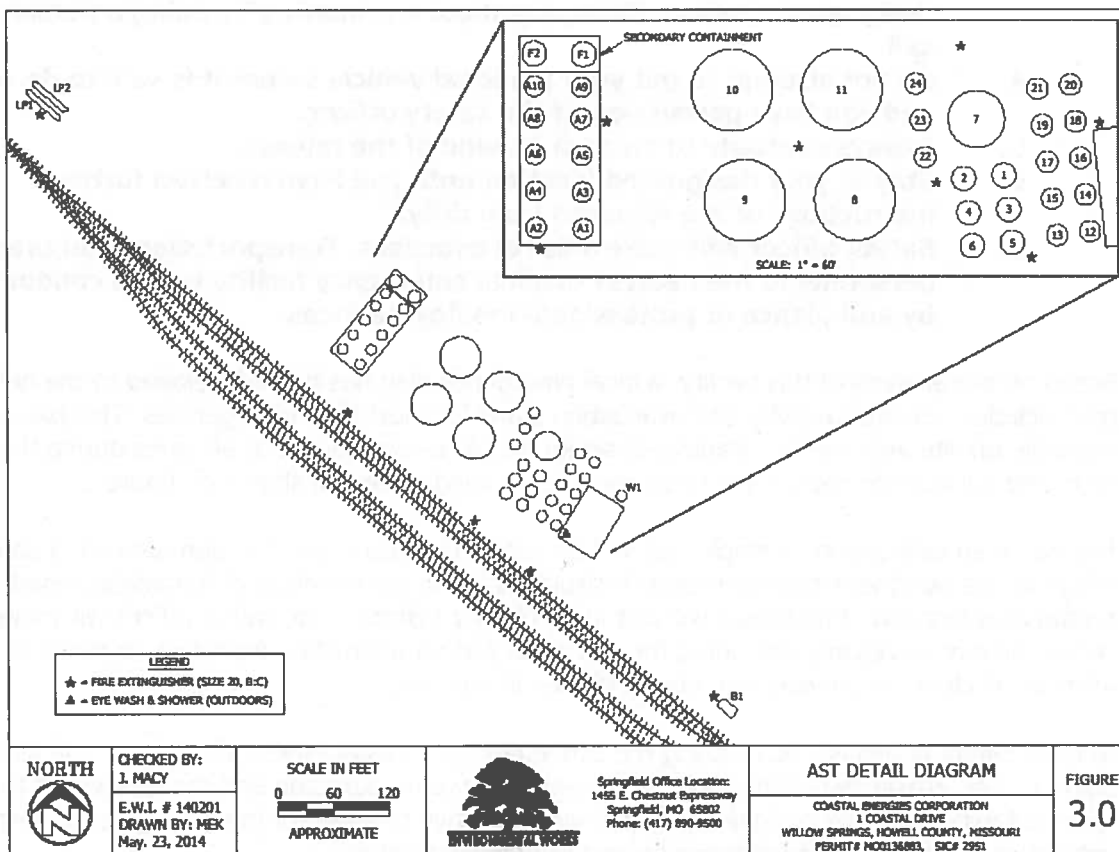
During evacuation consideration should be given to the following factors:

- Location of stored materials 30,000 gallon Ethanol tanks and 420,000 Asphaltic Oil tanks are very close to the facility operations building. Locations are shown in figure 2.
- Hazards imposed by spilled material - Ethanol is highly combustible. All tanks of various oils and materials should be considered in the event of an evacuation.
- Flow direction of the spill the flow direction of the material released will dictate evacuation paths. Generally speaking the topography of the site ensures the

flow will be down gradient to the levee and contained along the levee system to the secured outfall.

- Prevailing wind direction and speed - wind direction and speed should also be taken in consideration during the evacuation.
- Arrival route of emergency response equipment and personnel. There is only one ingress and egress to the facility along Burnham road. This is the reason for the evacuation routes chosen in figure 2, to stay out of the way of incoming emergency equipment.
- Evacuation route - The decision to evacuate will be made by the Safety Officer and QI. Predetermined route paths will be taken given local environmental factors and the type of emergency.

AST detail

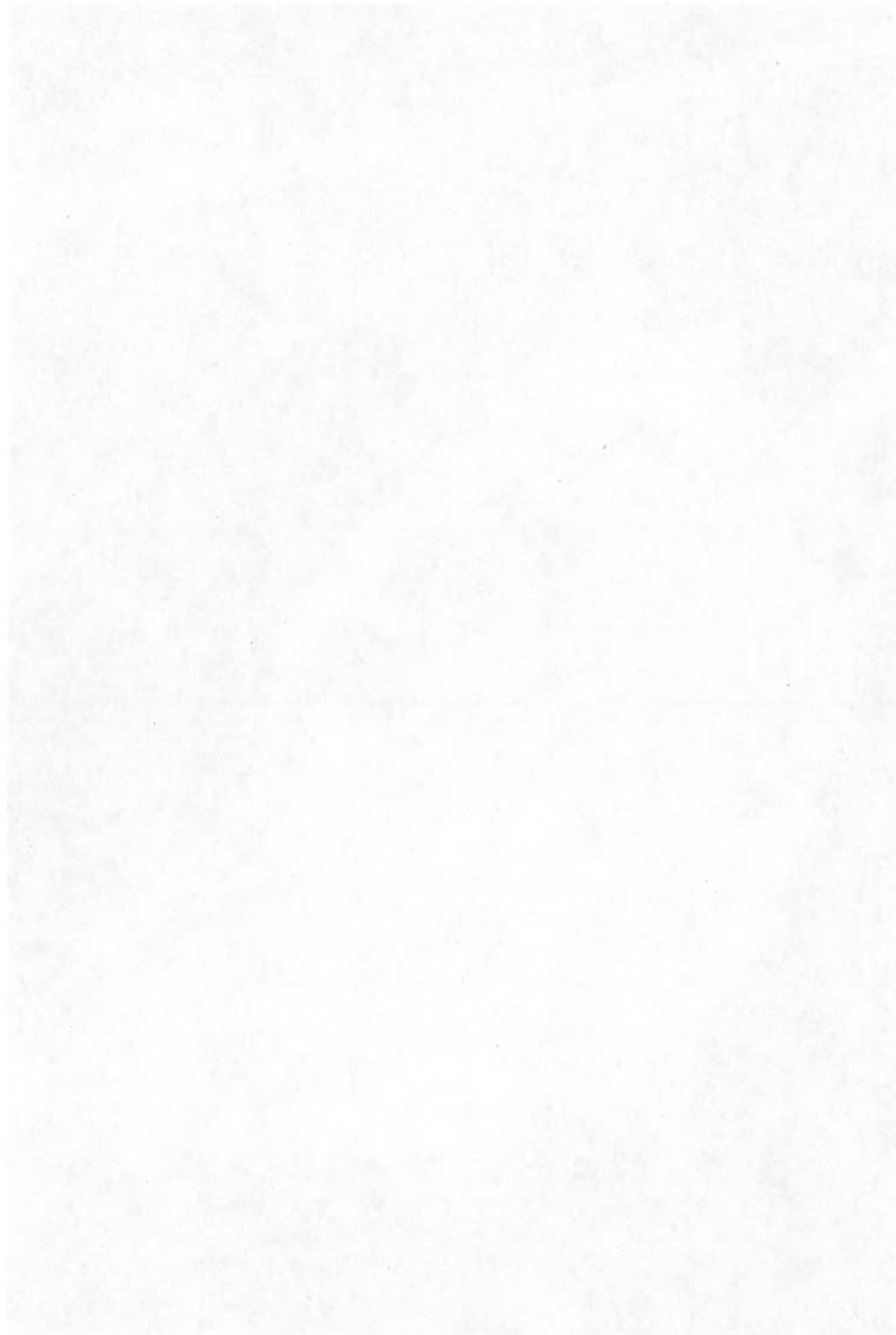


Evacuation map



Appendix G

QI Training



Section 3: Training for Qualified Individuals

Industry response plan holders must identify a qualified individual who will act as the point of contact between the federal government and the owner or Operator of the vessel or facility. This individual is also referred to as the emergency response coordinator by EPA regulations. The responsibilities of the qualified individual go far beyond that of a mere intermediary. As defined in OPA, the qualified individual is that person identified in a response plan having "full authority to implement removal actions" on behalf of the plan holder. The qualified individual must have the authority to commit the financial resources of the company to prevent or clean up a spill.

One of the primary responsibilities of the qualified individual is, upon learning of a spill or potential spill of an oil or hazardous substance, to immediately communicate with the appropriate federal official and the persons providing personnel and equipment for the spill response. This procedure will ensure timely notification of federal officials so that they may activate Area Contingency Plans notify other federal, state, and local agencies ensure adequate measures are taken by the responsible party and activate governmental response resources when necessary. It also ensures that response resources identified by the plan holder will commence appropriate response actions in a timely manner.

Federal regulations require response plan holders to identify the type of training the qualified individual will receive. The goal is to ensure that the qualified individual is fully capable to perform his or her duties. Although the qualified individual is not expected to be a technical expert in vessel salvage, clean-up technology, or pipeline repair, the qualified individual must be familiar enough with the company's response plan to know what measures must be taken under the circumstances. The qualified individual must ensure adequate steps are taken to mitigate the situation and should know the capabilities of any oil spill removal organization (OSRO) which is contracted to respond on behalf of the company. The qualified individual should be thoroughly familiar with procedures to activate and contract with the company's OSRO.

The following TAB provides suggested elements which could be incorporated into the training program for a qualified individual. The material should not be considered as mandatory training nor should it be considered all-inclusive. A training program which provided all of the suggested training elements would certainly be very comprehensive. An individual receiving this training would have an excellent educational foundation to help him or her play a highly pro active role in the plan holder's response organization. Plan holders must decide the actual role of the qualified individual in their organizations and customize their training programs accordingly.

TAB A

Suggested training elements for qualified Individuals:

Demonstrate knowledge of the following:

- ◆ Captain of the Port (COTP) Zones or Environmental Protection Agency (EPA) Regions in which the vessel will operate or facility is located.
- ◆ Notification procedures and requirements for vessel or facility owners or operators; internal response organizations; federal and state agencies; and contracted oil spill removal organizations (OSROs) and the information required for those organizations.
- ◆ Communication system used for the notifications.
- ◆ Information on the cargoes carried by the vessel or transferred, stored, or used by the facility, including familiarity with the material safety data sheets, special handling procedures, health and safety hazards, spill and fire fighting procedures.
- ◆ Procedures the crew or facility personnel may use to mitigate or prevent any discharge or a substantial threat of a discharge of oil resulting from shipboard or facility operational activities associated with internal or external cargo transfers, storage, or use.
- ◆ Procedures the vessel's crew may use to mitigate or prevent any discharge or a substantial threat of a discharge of oil in the event of --
 - Grounding or stranding;
 - Collision;
 - Explosion or fire;
 - Hull failure;
 - Excessive list; or
 - Equipment failure.
- ◆ Procedures for both the internal and ship-to-ship transfers of cargo in an emergency.
- ◆ Procedures and arrangements for emergency towing, including the rigging and operation of any emergency towing equipment aboard the vessel.
- ◆ Vessel crew or facility personnel responsibilities, and procedures for use of shipboard or facility equipment which may be carried to mitigate an oil discharge.
- ◆ The vessel crew's responsibilities, if any, to initiate a response and supervise shore-based response resources.
- ◆ Operational capabilities of the contracted OSROs to respond to the following:
 - Average most probable discharge (small discharge);
 - Maximum most probable discharge (medium discharge); and
 - Worst case discharge.

♦ Responsibilities and authorities of the qualified individual as described in the vessel or facility response plan and company response organization.

♦ Procedures, if applicable, for transferring responsibility for direction of response activities from vessel personnel to the shore-based spill management team.

♦ The organizational structure that will be used to manage the response actions, including —

- Command and control;
- Public Information;
- Safety;
- Liaison with government agencies;
- Spill response operations;
- Planning;
- Logistics support; and
- Finance.

♦ The responsibilities and duties of each oil spill management team member within the organizational structure.

♦ The drill and exercise program to meet federal and state regulations as required under OPA.

♦ The role of the qualified individual in the post discharge review of the plan to evaluate and validate its effectiveness.

♦ Area Contingency Plans (ACPs) for the areas in which the vessel operates or the facility is located.

♦ The National Contingency Plan (NCP).

♦ Roles and responsibilities of federal and state agencies in pollution response.

♦ Available response resources identified in response plan.

♦ Contracting and ordering procedures to acquire oil spill removal organization resources identified in the response plan.

♦ Occupational Safety and Health Administration (OSHA) requirements for worker health and safety (29 CFR 1910.120).

♦ Incident Command System/Unified Command System.

♦ Public affairs.

♦ Crisis management.

♦ Procedures for the plan holder's ship salvage arrangements.

♦ Procedures for obtaining approval for dispersant use or in-situ burning of the spill.

♦ Oil spill trajectory analyses.

♦ Sensitive biological areas. ■

Section 6: Training for Facility Personnel

Facility owners and operators are required to explain in detail how to implement the facility's emergency response plan by describing response actions to be carried out under the plan to ensure the safety of the facility and to mitigate or prevent discharges. They must identify the response resources for worst case discharges and identify facility personnel responsible for performing specific procedures to mitigate or prevent a discharge or potential discharge.

Prevention Training Requirements: EPA's current oil pollution prevention regulations (40 CFR part 112), also known as the Spill Prevention, Control and Countermeasures (SPCC) rule, states that training exercises should be conducted at least yearly for all personnel. Training should be given to new employees within one week of beginning work, and spill prevention briefings should be scheduled and conducted for the facility's operating personnel at least once a year. Prevention training must include, but is not limited to, the following subjects:

- ✕ Operations and maintenance of equipment;
- ✕ Applicable pollution control laws;
- ✕ Contents of facility's SPCC plan; and
- ✕ General facility operations.

EPA has proposed, but not finalized, several additional prevention training requirements as follows: (1) the training previously described is proposed as a requirement, and (2) personnel involved in oil-handling activities at facilities with certain operations are proposed to receive at least 8 hours of training initially and at least 4 hours of refresher training per year.

Response Training Requirements: EPA's final facility response plan rule requires the owner or operator of a substantial harm facility to have a training program for those personnel involved in oil spill response activities [59 FR 34097; July 1, 1994]. The rule recommends that the training program be based on this reference manual, as applicable to facility operations, or a facility can develop its own response training program subject to approval by the appropriate EPA Regional Administrator.

MMS regulations require that personnel who respond to spills through deployment and operation of oil spill response equipment be provided with hands-on training classes at least annually [30 CFR 250.43]. In addition, future MMS regulations may require a description of the training to be carried out under the plan.

Coast Guard regulations require the owner or operator of marine-transportation-related (MTR) facilities to identify the training to be provided to each individual with responsibilities in the response plan.

If the individual will always fill the same function in the facility response plan, training requirements will be narrowed in scope. If a company desires greater flexibility in use of its personnel and redundancy in available knowledge in case key personnel are unavailable, it may choose to add to the curricula presented to facility operators. The following 6-A provides suggested elements which could be incorporated into the training program for facility personnel. The material should not be considered as mandatory training nor should it be considered all-inclusive. A training program which provided all

- Public Information;
 - Safety;
 - Liaison with government agencies;
 - Spill response operations;
 - Planning;
 - Logistics support; and
 - Finance.
-
- ♦ The drill and exercise program to meet the federal requirements.
 - ♦ The Area Contingency Plan for the area in which the facility is located.
 - ♦ The National Contingency Plan.
 - ♦ Roles and responsibilities of federal and state agencies in pollution response.
 - ♦ OSHA requirements for worker health and safety (29 CFR 1910.120).■

